Standpoint of State Enterprise Radioactive Waste

According to Article 3, item 8 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo convention) on proposals, suggestions, opinions and objections as a result of the conducted public discussion of the

Environmental Impact Assessment Report (EIA Report) for the investment proposal:

CONSTRUCTION OF THE NATIONAL DISPOSAL FACILITY FOR LOW AND INTERMEDIATE LEVEL RADIOACTIVE WASTE – NDF

	Questions, proposals, suggestions, opinions and objections expressed by the Romanian public during the public discussion on the 9th of June 2016 in the town of Craiova, Romania	**Standpoint and motives of the Employer State Enterprise Radioactive Waste**
1	**Mr. Peter Panchev, Bulgaria**	
1.1	I would like to propose to Romanian Party to require Decision No11040 dated 22.07.2013 of the Bulgarian Suprime Administrative Court because today our hosts from the University of Craiova have showed me the correspondence between the two Ministries that shows that because of the technical omissions the Court has suspended that report. I would like to bring forward to the Romanian party the year 2013 Bulgarian Supreme Administration Court's Resolution.	The two decisions of the Bulgarian Suprime Administrative Court - Decision №11040 dated 22.07.2013 and Decision №15645 dated 26.11.2013, translated in English were submited to the Romanian Party by the Bulgarian Ministry of Environment and Waters.
1.2	I won't get into details, I will only try to bring under your attention the fact that within the second argumented Resolution of the Court, it is mentioned that the report includes many unjustifiable assertions. Unfortunately, there are many repeated excerpts in there, made with *„copy-paste*".	The subject of public discussion and EIA procedure is not the EIA Report from the year 2011, which is subject of the cited Decision of the Supreme Administrative Court, but the EIA Report from the year 2015. The assertion, that the updated EIA Report is *„copy-paste*" is personal opinion, which is not supported by facts and evidences.

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1.3	I would like to highlight something interesting for our neighbours and hosts from Romania: I would like to show you a study elaborated by the Bulgarian Academy of Sciences on the evaluated sites, analysis made following 30 indicators. Unfortunately, Radiana does not appear amongst the most favourite. For this reason, within the documents that I have requested from the Court I have seen mentioned scientific studies claiming that given the sandy and loamy ground out there and the quite high slope, a risk of landslides is present. Here is another report, made under a PHARE project and evaluated on 13 indicators. I would like to show them dozens of pages elaborated by the Geological Institute of the Science Academy. I would ask you to show these documents to the Mayor of Craiova, in order for them to be attached with this public debate and to be able to submit them in Court.	The cited documents were not presented during the public hearing of the EIA Report on the 9th of June 2016 in the town of Craiova in Romania The assertion that Radiana site was not among the preferred sites in the study under Program PHARE from 1997 and the study of GI-BAS, is false and manipulative. The site has been referred to as Kozloduy NPP site (the name Radiana was received in year 2008). In line with the international experience, the area close to existing nuclear facilities is always seen as particularly promising for the construction of a radioactive waste disposal facility. Even in the Report for review and selection of potential sites for a National disposal facility for radioactive waste (GI-BAS, 2005), Kozloduy NPP site is analyzed and ranged among the top three most promising candidate sites for construction of a National disposal facility. Regardless of the preferences in terms of Kozloduy NPP site, now called Radiana site, its selection is not based on the limited information that was available in the 90s of the last century. As described in the EIA Report, on Phase 3 - Characterization of sites on the stage of site selection, SERAW held detailed and thorough field geological, hydrogeological, geophysical, geochemical, engineering geological, seismic and other studies of the preferred sites Radiana, Brestova padina and Marichin valog, that were assessed in accordance with the nuclear legislation in Bulgaria and the international requirements, and Radiana site was defined as the preferred site. The opinion about a possible risk of occurrence of landslide process is completely unjustified based on the following reasons: 1 - Geomorphology of the natural slope (gentle slope from 3% to 15%) as well as the physical and mechanical parameters of the engineering geological varieties (including clay and sandy sediments of Brusarski

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		Formation), do not imply the development of landslide processes in the natural state of the slope. Nowhere in the area of Radiana site, neither in its surroundings, are found even minor landslide deformations in the natural slope. The latter is supported by the stability analyses of the natural slope performed at the stage of site selection. The resulting stability coefficients are significantly above admissible levels in basic loads combination as well as in seizmic impact. 2 - Within the framework of the Technical design of the NDF, prepared by highly qualified experts of Westinghouse were conducted stability analyzes with state of the art methods and software programs in six successive phases of construction, operation and closure of the repository. The results of these analyzes of all phases showed safety factor above permissible, including during seismic impacts.
1.4	During the public debate that has taken place in Bechet, the Mayor of Călărași, Mr. Vergică Șovăilă, has asked a question which stood also at the bottom of the Administrative Court's Resolution and which isn't accounted for as a technical mistake, but as a principle mistake: the rainforced concrete containers have a 70 years life time and you are saying that this repository can last for over 300 years; it's obviously something impossible! Even more than that, within the Court's Resolution was mentioned that the rainforced concrete container's life time is not of 70 years, but 50.	The question is misleading, because we have never stated that the lifetime of the containers is 70 years. The requirement is 50 years the metal handlings to work without maintenance, and 300 years is the institutional control and respectively – the retention and isolation functions. The question of durability of reinforced concrete containers (second engineering barrier of the multi-barrier protection system of the repository) is very well explained in the EIA Report as well as in the responses to questions posed by the Romanian Ministry of Environment, Water and Forests Regarding the alleged 50 years of durability of reinforced concrete

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		containers we would like to categorically state that apparently this issue is not understood, the statement does not reflect reality and is not based on the information for the multi-barrier engineering protection system of the repository presented in the EIA Report. According to the Technical design of the reinforced concrete containers, at least 50 years no maintenance/ repair of metal handlings (metal bearing ears) is required, which are used for operations of lifting, moving of containers and their transportation. Put another way, the minimum resource for transport and technological operations (handling with metal bearing ears) is 50 years. This period can easily be extended by implementing measures to support the bearing ears including the replacement of anticorrosion coating. The resource of reinforced concrete containers for storage (retention and isolation functions) according to its Technical design is estimated to 300 years. In terms of Radiana site, the mechanism of degradation of reinforced concrete is carbonation, which is a slow process and determines duration of resistance considerably longer than 300 years.
1.5	Inside the year 2011's report, there are some demographical data on the Dolj County's population variation. That section was also treating the mortality indicator: while the country average was about 11.7%, in Dolj County it was about 13.17%. From the Court's Resolution, there are the same differences regarding the Kozloduy area from Bulgaria. The conclusion is that blood related illnesses are involved, resulting in cancer.	In the statement of Mr. Peter Panchev, perhaps due to lack of knowledge of demographics, it is not clear which specific indicator he refers to. The "mortality" indicator is accounted as total mortality per 1 000 inhabitants of the population (‰) or as the standardized indicator of death by reasons of death, that measure the frequency of deaths divided by the different classes of diseases (ICD 10) and is usually expressed per 100 000 people. The values in % could relate to the structure of mortality indicator as the sum of shares of all classes of diseases, which is always equal to 100%. In the EIA Report from year 2011 are presented the values for the total mortality (1 000 people of the population) for Republic of Romania and

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		for Dolj county, 11.7‰ and 13.7‰ respectively. Examined is also the mortality in villages and towns for the country as a total and for the Dolj county. From the data that worried Mr. Peter Pantchev, and most likely concern the overall mortality (Table 3.11.7) it gets clear, that the minor differences pointed there are due to the higher mortality rate among the rural population in Dolj County. Mortality in the towns of Dolj county is close to the average for Romania-town - 9.4‰ and 9.7‰ respectively. In the villages of Dolj county, most probably because of accumulation of a large amount of old people and poor social and economic conditions, is established a higher mortality rate (18.6‰) compared to the average mortality of the rural population in the country (14.2‰). On the other hand, it is not clear what Mr. Peter Panchev aims to demonstrate, by citations of Resolutions of the Court for similar differences found in Kozloduy municipality. During the same year, with total mortality for Bulgaria 14.2‰, the mortality for Kozloduy municipality is slightly higher – 15.3‰. Based on this, a conclusion can be made that, although there are serious differences in the scale of the constituent entities, the state and dynamics in the development of Kozloduy Municipality and Dolj County are similar and can be expected identical development in the medium and long term. Regarding the demographic processes, both administrative units are experiencing negative population growth, and in Bulgaria the tendency is much higher. The negative statistics is determined both by the negative natural population growth in the components of Dolj county, as well as by the migration processes in them. The distribution of the population in the separate regions has some differences with the advantage of Dolj County due to deteriorating socio-economic conditions in Kozloduy in connection

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		with the closure of Units of KNPP and steady trend of increased desertification in the new economic environment. **The conclusion of Mr. Peter Panchev, that "there are involved blood-related illnesses, which result in cancer" is a total nonsense, is not supported by evidence and probably its aim is to create confusion in the population close to the disposal facility.**
1.6	Concerning the second report, we have mentioned that there are "*Copy-Pasted*" excerpts. For instance from the report of the Public Health Ministry in Bulgaria, where there is data also on long life radioactive waste, which is off the 2a class, going into 2b. According to the regulatory acts, 2b class waste needs to be stored together with the nuclear waste resulted from the nuclear fuel.	The assertion, that the updated EIA Report is *„copy-paste*" is a personal opinion, which is not supported by facts and evidences. The assertion that in the National disposal facility will be stored long-lived radioactive waste is false. Also false and manipulative is the assertion that this is the position of the Bulgarian Ministry of Health. We categorically declare, that in the National disposal facility will be disposed only radioactive waste category 2a. The legislator has clearly defined what represent the radioactive waste category 2a and the waste to be disposed in the National disposal facility meets the criteria for RAW category 2a. According to Article 6, par. 2, it.2a of the Regulation for Safe Management of Radioactive Waste: "*Category 2a – low and intermediate level waste containing mainly short-lived radionuclides (with a half-life shorter or equal to that of Cs-137) as well as long-lived radionuclides at significantly lower level of activity, limited for the long-lived alpha-emitters below 4.10^6 Bq/kg for each individual waste package and maximum average value for all the packages in respective facility 4.10^5 Bq/kg".* The definition of the legislator shows that radioactive waste category 2a

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		contain mostly short-lived radionuclides and small amount of long-lived radionuclides whose content is below a certain limit. Radioactive waste which will be disposed in the National disposal facility fully comply with these criteria. The fact, that in the National disposal facility will be disposed only radioactive waste category 2a is confirmed by the competent authority of the Republic of Bulgaria - Bulgarian Nuclear Regulatory Agency, which granted the design permit of the NDF for the disposal of radioactive waste category 2a based namely on the inventory of radioactive waste subject to disposal
1.7	The Executive Director of the State Enterprise Radioactive Waste, Mr. Dilyan Petrov, during a roundtable on radioactive waste on the 16th of February this year in Kozloduy, to a question he received from a worldwide known expert (the Court's Resolution is stating that the human health is overriding the economic benefit), Mr. Dilyan Petrov has worried me with his answer: "*in the NW Bulgaria, the population number is decreasing and therefore we are not insisting too much on the health assessment*". I'm living on the other side of the Danube, opposite from Craiova. I know that we are the poorest area in the EU, but given the data I have mentioned earlier on this area's condition, it comes out that the SW Romania should be part of the same category regarding the population's health.	The assertion that the executive director of SERAW expressed such opinion is false. Protection of people and the environment, both on the territory of Bulgaria and beyond the national borders is a fundamental principle of the International Atomic Energy Agency, which SERAW strictly observes in its operations. We would like to emphasize that this statement of Mr. Penchev represents an insult not only to SERAW but also to the competent authorities of the Republic of Bulgaria as the Bulgarian Nuclear Regulatory Agency, Ministry of Environment and Water and the Ministry of Health, which control the activities of SERAW.
1.8	This is a letter from the Environmental Ministry's behalf, sent to the State Enterprise, recommending them to answer the questions that I have presented by now. Not even in the 3rd reply posted on the the Company's website I haven't	SERAW answered to Mr. Penchev in due time.

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	received answer to the point of my questions.	
2	**Mr. Chiriac Constantin**	
2.1	I would like to ask you about the guarantee that the Bulgarian Site is going to provide for the concrete.	Bulgarian side guarantees that the operational lifetime of the reinforced structure of the disposal facility is 375 years, which covers the period of operation of the facility, closure period and period of institutional control. After this period the disposal facility poses no risk to the population and the environment due to the natural processes of radioactive decay, and the site can be released for unrestricted use. There, people could live their lives, build houses, growing plants, raising animals, anything the population could decide on after this period. Guarantee for this is the design solution on which the Technical design of the NDF is based, the independent evaluation of the compliance of the design with the Law on Spatial Planning and the regulations, made by a licensed construction supervisor, independent evaluation of the Intermediate Safety Assessment Report, coordination of the Design with a number of competent authorities, approval of the design by the Ministry of Regional Development and Public Works and Bulgarian Nuclear Regulatory Agency, carry out the construction in accordance with the procedures for nuclear facilities, as well as control during construction, which is exercised by independent construction supervisor, designer, SERAW, international consultant of SERAW and competent authorities. The structures of NDF are designed and will be constructed entirely in full compliance of the code system EUROCODE, in adopting more conservative requirements from those laid down in the regulations parameters for structures related with the safety in short and long term aspect.

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		The NDF structures are designed and shall be constructed in such a way that during the foreseen operational period to reliably: - withstand all the impacts and influences that will occur during the implementation and operation thereof, and - maintain the required operational capability. The structure is designed to have sufficient load-bearing capacity, operability and durability. The design of the structure meets the criteria for reliability and conceptual requirements that shall be met. Structures having safety functions are designed for: - Class of responsibility CC3 according to BS EN 1990; - Class of reliability RC3 according to BS EN 1990; - Level of control over the design DSL3 according to BS EN 1990; - Level of inspection IL3 according to BS EN 1990. These structures are designed to continue to perform their safety functions at acceleration of the ground of 0,2g, according to accepted norms for construction of nuclear facilities and the IAEA recommendations. Determination of this ratio as adequate based on the vast operational experience of NPP Kozloduy, and nearly half a century of seismic monitoring of the site performed by KNPP. For the construction of the NDF will be used concrete that has the following parameters: Concrete grade C35 / 45 BS EN 1992-1-1 and BS EN 206-1. Concrete grade on impact of the environment:

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		- XC4: Cyclic wet and dry (bare concrete surfaces); - XF4: High water saturation with de-icing substances; - XA3: Highly aggressive chemical environment The concrete shall contain sulphate cement according to BS EN 197-1 and to be implemented in a manner which to ensure water-tightness of structures. Reinforcing steel grade B500B according to BS EN 10080. It should also be noted that additional measures are taken for hydro insulation of the system through layers of internal and external hydro insulation. Last but not least, it should be noted that the construction of the repository is part of a multi-barrier protection of the disposal facility. The protective multi barrier system is described in detail in the EIA Report. We are going to emphasize here the important role of the fourth and fifth barriers for protection of the NDF structure. The natural barrier (the fifth barrier) represents the favorable conditions of the site which is selected after a site selection procedure described in detail in the EIA Report. Important relation to the durability of the structure of the NDF have the favorable geochemical characteristics of the natural environment, which exclude the presence of chemically active reagents, which may reduce the durability of the structure. Substantial importance for the durability of the construction has the multilayer protective cover, which will be constructed above the filled disposal facility and protects the structure from external influences. The protective multi barrier cover is constructed entirely of natural materials (clay, sand, gravel, etc.) in order to: (1) minimize as much as possible the ingress of surface water ensuring infiltration hydraulic flow below 1.5 L/ m^2 per year in the repository modules; (2) serve as a barrier against external damaging of the system by human, animals or vegetation; (3) provide protection against

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		continuous erosion agents, such as rainfall and wind. Within the Technical design is carried out a detailed analysis and assessment of degradation of the reinforced concrete components of the facility. The analysis examines the main physico-chemical processes of degradation of these structures. Within this study, it was found that: As a result of occurring carbonization is estimated that during 375 years the depth of the process with conservative assumptions will be 40.8 mm. Bearing in mind that the reinforcement of concrete is placed at at least 50 mm, leads to the conclusion that this process would not create conditions for beginning of the corrosion of reinforcement before 563.6 years. Degradation as a result of thermal cycles should not be possible, because the process is typical for surface structures and such buried up to 2-3 meters. Considering the depth of the buried cells below the multi-layer cover, the facility will be located in isothermal conditions. Nevertheless, in order to ensure the quality of the construction, in the Technical design is envisaged class of the concrete XC4 and XF4. Degradation by chemically aggressive environment is also not expected because geological and socio-economic factors do not suggest their presence on the site. However, the Design envisages concrete XA3. For preventing and delaying alkali-silikate reactions (ASR) is envisaged the concrete to be Na_2O Eq. <0.6% i.e. reactive alkali < 3kg/m^3, which in turn results in a practical halt of this degradation process over the period into consideration. Based on these measures reinforced concrete structures should maintain their integrity not only for the entire institutional control period but also for considerable period thereafter.

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2.2	The second question: where is this money coming from, there are different legends out there.	The question for financing of the project for construction of the National disposal facility is outside the scope of the EIA Report. Nevertheless, because we would like to be totally transparent, we provide the required information. The project for construction of the NDF is financed from the following sources: - Fund Radioactive waste, which is created in line with the requirements of Chapter 4 Management of radioactive waste, Section 3 - RAW management Financing, of the Bulgarian Act on the safe use of nuclear energy - International fund for support of the decommissioning of Units 1-4 of KNPP, which is financed by the European Commission and the donor countries
3	**Mr. Dan Ilincioiu**	
3.1.	I feel sorry that I need to start with some assertions about myself, but it is required in order to set the discussion: I'm a specialist, on part of it, not the entire domain, but on most of it. My Ph.D. thesis was in underground constructions. It's not steel, but reinforced concrete. I'm an University professor, specialist in materials' resistance and a Ph.D. supervisor, therefore I know what materials and their behaviour in time mean. When we say 370 years we should be frightened if we know what we are talking about. My hand is trembling when required to sign documents guaranteeing for more than 30 years. I'm taking the specialists' assertions guaranteeing for a longer period of time as swearing.	Mr. DanIlincioiu expresses emotional personal opinion, which is not supported by facts and evidences. The statement of the Employer concerning durability of concrete is presented in item 2.1.

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3.2	In order to stabilise my position: I have read many materials during my life. This is not a technical report, but a typical document. If I would be a specialist in the Journalism or Communication Technology Faculties, I would use this as an educational example for students, highlighting the misinformation technique. It is a mixture. I'm no specialist in misinformation, but this is a mixture of both data and nice information for the public. I think that the authors of this material have taken lots of money for this, given that is a well-made material for the before mentioned purpose. I am regarding them as mercenaries trying to gain their money.	The expressed opinion is personal emotional assessment which is unjustified because it is not based on facts and figures.
3.3	I would like to ask the geology specialist a question and I'm requesting a short answer, right here and right now, not stories: what were the geological conditions for the repositories from Spain that have been mentioned within this material?	The repository El Cabril, Spain, is constructed on a rock groundbase. The repositories in France, Slovakia and Czech republic are founded on clay formations. In France, construction of a repository for high-level waste in clay sediments is forthcoming. Globally, the clay sedimentary formations are preferred than the rock formations because of their numerous advantages in terms of limiting the migration of radionuclides. The rock formations are more or less cracked and the cracks are shortcuts for migration of radionuclides. On a global level, it is proven that there is no better isolation material than clay.
3.4	How is clay acting in contact with water? How should I know what tectonical movements are there?	In line with the requirements of the geotechnical standards strength deformation parameters of all geotechnical varieties, comprising the groundbase are determined in saturated state of the test samples. In other words, the behavior of geotechnical variations in water saturation is analyzed and taken into account in the Design of the disposal facility when assessing the bearing capacity and maximum subsidence of the

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		ground. From the seismic-tectonic point of view, the region of the Radiana site is situated in the westernpart of a stable tectonic structure – the so-called Moezian Platform. The major tectonic activities in this structure ceased during the Jurassic, i.e., 150 million years ago. Since then, the MoezianPlatform has been subjected mainly to fluctuating movements. During the Quaternary the Moezian Platform, and the Kozloduy region in particular, appears to be one of the calmest areas compared to other parts not only of Bulgaria but overall South East Europe. Approximately the current geomorphological appearance Radiana site terrain has acquired about more than 650 000 years ago, when Danube was incised and passed over approximately along the current location. For additional information, see the statement of the question 7.3.
3.5	I would additionally ask: what is the scientific level of the geologist here?	Mr. Doncho Karastanev is doctor in engineering geology and professor in the Geology Institute at the Bulgarian Academy of Sciences.
3.6	Regarding the construction, I won't sign anything that has a length of more than 50 years. It is counting on the idea that the reinforced concrete is deathless. In some conditions, the concrete is being powdered. The conditions of the environment have not been set.	The expressed opinion represents personal emotional estimation, which is not justified because it is not based on facts and evidences. The conditions of the geological environment are described in detail in the EIA Report. Concerning the structure, refer to answer to item 2.1.
	I am being paid for elaborating technical reports; therefore I won't make you a technical report. I will keep it short, because this meeting is being made just in order for the Bulgarian party to check it off. The construction is not in Bulgaria, but in Romania, as an effect: the mountain is behind, where is the outlet?	Expressed is a personal emotional judgment regarding the project, which is ill-grounded, as it is not supported by facts and evidence.

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	As a plastic conclusion, the project is an abomination and you have my word on that, I'm speaking from a technical point of view. Thank you! I don't require an answer for that because we will waste the people here's time. I would like to know what is the amount that has been paid for these studies, studies through which even I could prove I'm a woman. It's my word against others.	The amount of money that SERAW pays under signed contracts is not a subject of the EIA Report.
4	**Ms. Luminița Simoiu**	
4.1	I would like to show you that these flyers are disclosing us – as Ms. Svetlana Alexievich, a Nobel Prize laureate was recommending within her book: "*Chernobyl Prayer: A Chronicle of the Future*" that the Chernobyl sarcophagus should be visited by the ones looking for hot sensations – the Bulgarian invitation to tourism on the Radiana site. I would like that note should be taken of the fact that this is no real debate, but some marketing information. Therefore, I need to say that this is no information, actually, but a misinformation and manipulation of the Romanian public. Here's one of the proofs: if you will take a look over the placard that has been posted on this concert room's door only five minutes ahead of starting this discussion – breaking any prevision of both Espoo and Aarhus Conventions, including the Law 86/2000 through which the Aarchus Convention has been ratified. On this poster is saying that this repository is going to be used for storing the waste that will result from operating the units 5-6, in	Emotional personal opinion is expressed, which connects the construction of a National disposal facility with the Chernobyl accident, which is unreasonable and not supported by facts and evidence. The statement of the Employer is that the Romanian side is provided with detailed information both in the EIA Report, and in the visual materials and presentations presented during the public hearing. The sources of radioactive waste which will be disposed in the NDF are specified as explained in the EIA Report. This is RAW from operation of Units 1-6 of KNPP, including waste which would be generated in case of possible extension of operational lifetime of Units 5 and 6, waste from decommissioning of both the stopped and presently operating units, waste from future nuclear facilities if such are constructed and waste generated during use of sources of ionizing radiation in industry, science

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	addition to the one from units 1-4. In this informing material for the Romanian public, we are being told that it is about storing the waste that will result from decommissioning the units 1-4. I have red the 128 pages of this project's non-technical description, being related there that this repository will store also the waste resulted from the 20 years life time extension for Kozloduy's units 5-6.	and medicine. The repository will be constructed in phases, of which the first phase is for the waste from the decommissioning of units 1-4 of Kozloduy NPP. This information is included in the EIA report.
4.2	There have been no public debates in Romania about this; it is well known that unit 5 is going to end it's life time in 2017 and unit 6 in 2019. However, there have been no discussions about this with the Romanian public.	The question for the public discussion of the extension of the operational lifetime of Units 5 and 6 of KNPP is not related to the EIA procedure for the investment proposal of SERAW for construction of National disposal facility for radioactive waste.
	For the MMAP: as the public debates from Bulgaria have been mentioned here earlier, I will read my questions/comments that I was addressing to MMAP one year ago and have still remained without an answer: The Bulgarian Ministry of Environment has transmitted through the letter no. 67505/29.12.2014 a new notification towards MMAP, registered at the latter with no. 13194/MF/09.01.2015. The notification was referring at resuming the EIA procedures on the Radiana radioactive waste repository. At 06.04.2015, MMAP has received the calendar for the public debates set to take place in Bulgaria, that have been resumed due to winning the litigation in court. This information, along with the one on the calendar and with other documentation of the project, have been published in English at 09.04.2015 on the MMAP website. In conclusion, three months were necessary in order to publish this information. I have received the notification at	Expressed are questions and comments to the Romanian authorities - Romanian Ministry of Environment, Water and Forests, which are not in the field of competence of SERAW.

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	the faculty in an e-mail, saying that if we are interested on the public debates in Bulgaria, we will be informed about them, according to the schedule, at 22.04.2015. It was never mentioned that the Bulgarian Ministry has declared that if the Romanian public is interested to participate, they should announce it with at least seven days in advance. If you do the calculation, the result is 29. The debates in Bulgaria were ending on the 30th April! Therefore, the delay in informing the Romanian population has prevented the participation of the Romanian public – which was very interested on the debates in Bulgaria. I've sent an inquiry to the MMAP, asking why was the Romanian public informed so late about the debates. I have also asked – the question still being valid, because it hasn't been answered yet – what was the criteria that stood before choosing in 2011 only the Bechet Town for organising public debates? I didn't receive any answer! Through the comments that we have submitted on the last year's 8th of May, we have asked – requested by the civil society in Bulgaria – whether the Romanian Government is planning to negotiate with the Bulgarian correspondents to organise the resumed public debates in Bulgaria also in Romania. In order to prove our fairness and non-political affiliation, I need to say that the MMAP's answer was at least unsatisfying, because it was answered only after writing back to them. And it was a proof of lack of professionalism, given that on the first half of page was related the Ministry's legal basis and on the second half – as an answer to the 18 question asked, including also the question on whether the Ministry is considering inviting the Bulgarian Government's	

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	representatives to the public debates – we were told that they are still thinking on whether resuming the debates also in Romania is still relevant. We are wondering whether the today's debate – and I repeat: I am not considering it more than an informal meeting – is the debate that we have waited for almost a year now. I am willing to inform the people here on how they were represented by the Romanian environmental authorities.	
4.3	During the last year, we have organised debates with the civil society and invited oncologists, Romanian environmental organisations' representatives, in order to find out what is the state of this objective. We have found out from the disclosed documents that the repository has to start functioning in 2015. Why is our point of view being requested NOW? I am asking you: how could an unwitting public elaborate any relevant comments (as requested) if we don't have a debate first and draw conclusions afterwards? Therefore, the history is repeating as with the last year when requested comments.	According to the Strategy for management of spent nuclear fuel and radioactive waste until year 2030, which was adopted in January 2011, the National disposal facility had to be constructed until year 2015. According to the updated Strategy of Republic of Bulgaria in force presently, which is adopted by the Council of Ministers in September 2015, the National disposal facility is to be constructed until end of year 2021. The procedure for public discussion in Romania is defined by the legal framework of Romania and is not in the competence of the Employer.
4.4	I would like the Bulgarian Government's representatives to tell us whether they know what guarantees have been requested by the Government for the cases when a nuclear facility is to be built. I know the answer, including the guarantees that are being requested by Germany in these sort of situations: unlimited guarantees! In case of an unfortunate nuclear accident (to be honest, I'm not sure what guarantees are requested by the Romanian State for	Concerning guarantees please see the answer below in 4.11. Regarding the statements of Ms. Luminița Simoiu, that „Germany provides unlimited guarantees, while Bulgarian State provides for the Bulgarian citizens guarantee for nuclear accident amounting 50 million €" no evidences are presented. During the public discussion of the EIA Reportin the Craiova (recorded in Annex 3 to the Minutes of the public hearing), Bulgarian side persistently asked Ms. Luminiţa Simoiu to

<table>
<tr><th></th><th>Questions, proposals, suggestions, opinions and objections expressed by the Romanian public during the public discussion on the 9th of June 2016 in the town of Craiova, Romania</th><th>Standpoint and motives of the Employer State Enterprise Radioactive Waste</th></tr>
<tr><td></td><td>its citizens), the answer is that for its citizens the Bulgarian State is requesting for about 50 million €. This ammount has been confirmed to me in a recent conference that I have attended in Prague, between 3-4 April. I would read a journalist's comment, just for the Romanian public: in order to transfer a football player, the guarantees requested are of 300 million €, but for the Bulgarian citizens in case of a nuclear accident only 50 million €.</td><td>support her claims with official documents.

Not only that it was not done, but as Ms. Luminița Simoiu admitted (see item 4.14) „My information may be true, may be not".</td></tr>
<tr><td>4.5</td><td>Regarding the healh issue: a paediatrics oncology physicist of Dolj's County Hospital, Polixenia Stancu, has informed us during the last year's debates, based on official data, that from all of the registered cancer cases in the Dolj County, 60% of them are registered in Craiova. One of the explanations is the following: lots of young people have left the 23 localities that are being included within the description of both this project and the new nuclear reactor that is going to be built. As far as we know, Westinghouse has pulled away from Unit 7, so what kind of consultant is this anyway? Also we know that many young people have moved to Craiova. Dr. Polixenia Stancu was telling us that the thyroidian cancer in children has a high incidence and the only explanation is based on the high level of radiations. This is our answer for you telling us the area's depopulation is pending: this is happening because our children are dying. As for our friends in Bulgaria: people's life needs to be seen as equal, regardless of the side of the Danube they are living on. We are not Romanian or Bulgarian citizens, but European. And the right to a healthy life and environment is one highlighted by both constitutions.</td><td>According to data of the National Statistical Institutes of Romania (http://statistici.insse.ro/shop/?lang=en) and Bulgaria(http://www.nsi.bg/en), mortality by oncological diseases in 100 000 people in districts Dolj and Olt during the last 4 years is lower than the average for Republic of Romania and lower than the one for Vratsa district:
<table>
<tr><td></td><td>2010</td><td>2011</td><td>2012</td><td>2013</td></tr>
<tr><td>Romania</td><td>211.2‰</td><td>215.5‰</td><td>219.0‰</td><td>222.4‰</td></tr>
<tr><td>District Dolj and Olt</td><td>198.8‰</td><td>193.1‰</td><td>208.7‰</td><td>206.8‰</td></tr>
<tr><td>District Vratsa</td><td>304.3‰</td><td>307.7‰</td><td>296.0‰</td><td>320.0‰</td></tr>
</table>
It can be concluded that the mortality caused by oncological diseases within the 30 km surveillance zone of Kozloduy NPP on the territory of Romania does not differ from that of the entire population of the country. Mortality from oncological diseases is lower than that on Bulgarian territory and the average oncological mortality in the Republic of Romania. According to EUROSTAT data, it is one of the lowest in the European Region for the period 2008-2010.

The expressed judgment on child morbidity (not supported by evidence) can be easily refuted with real studies of the populated areas located</td></tr>
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		closest to Kozloduy NPP. In most cases, analysis of radiation impact on the child's body is different from that of adults, which affects the overall forecast for the health of future generations. In terms of activity of the NPP Kozloduy, twice - in 2003 and 2012, by the National Center for Radiobiology and Radiation Protection (NCRRP) were performed studies on children from the area of the NPP in order to identify possible local changes on the thyroid gland. Measurements in 2003 were performed with 150 children from Kozloduy, Oryahovo, Misia, Selanovtsi and Harlets. It is estimated the content of ^{131}I. The final analysis of the results shows that there are no indications for the presence of artificial radionuclides in the body of the measured persons, and ^{131}I in their thyroid glands. In 2012, it assessed the content of technogenic radionuclides in the bodies of the 180 children, living in the surveillance zone in the town of Kozloduy, town of Oryahovo, town of Mizia and the village Harlets. Some adults were included voluntarily in the test sample and so measurements are performed in 219 persons[1] The results show that in none of the measured persons is detected radioactivity by technogenic gamma quanta emitting radionuclides neither in whole body counting nor in measurements of the thyroid gland of patients. Based on the results obtained, it can be concluded that during operation,

1 Report from Contract № 226000016 / 15.10.2012 between Kozloduy NPP and the NCRRP "Independent expert evaluation of the content of radionuclides by direct methods in the body of the 180 children living in the 30 km surveillance zone of Kozloduy NPP", 2013

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		NPP Kozloduy has been observing the technological regime, and no contamination of the environment above the established norms and respectively receipt of artificial radionuclides in the population, leading to increase of internal exposure was admitted. As per the Action Plan on Environment and Health, Section 5 "Children Health-Environment", the Inspection for control in nuclear energy held in 2013 measurements of the concentration of Radon in the air in two schools in Mizia and Oryahovo. The monitoring results show that the natural gamma background in the region of 6-90 km zone around the nuclear power plant is not affected by the operation of nuclear facilities and did not differ from the typical for the regions local gamma background. Radioactivity in air, water, soil, flora and fauna vary within normal limits. There are no deviations from the regulatory requirements for radiation protection. The annual effective dose of radiation over the background of members of the public living around the NPP is less than 10 μSv by assessment, based on the results of radiation monitoring in these areas. As for the migration of many young people in Craiova, it is possibly due to socio-economic problems in the small settlements related to the inability to provide good living conditions for young people (work according qualifications and other social and living conditions). **We would kindly ask Ms. Luminiţa Simoiu not to disseminate fabrications.** Nobody of the team that prepared the EIA Report has ever said that depopulation of the region is forthcoming, nor to speculate that this happens because your children die.
4.6	I don't want to make any comments on the technical aspects, because it's not part of my expertise – given I'm a teacher in Phisical Chemistry. But reading through the	Radiation effects are deterministic (not probabilistic or threshold) and stochastic (probabilistic or non-threshold). *Deterministic* are the effects that are manifested in case of high-dose

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	entire documentation, there is one clear conclusion: there is no significant risk involved. The question is: what actually means „*significant*"? He won't die tomorrow, or the day after. But will he die in one year, or ten? The entire documentation is filled with ambiguities.	irradiation (absorbed dose over 1 ÷ 2 Gy), which causes death of large numbers of cells and irreversible damage to the impaired organ. The restriction introduced with limits of the annual effective dose 1mSv for the population and 20 mSv for the personnel provides prevention of deterministic effects. The cumulative radiation impact on the population of the existing facilities at the site and all planned to build new facilities is below 10 μSv per year. This value is much lower than the established limits and this is sufficient reason to conclude that there is no risk of deterministic effects. *Stochastic* are the effects that are a result of damage to a single cell. In most cases this does not lead to a change in the functions of the tissue, but may result in malignancies. The term "genetic risk" means the likelihood of harmful genetic effects occurring in the offspring of the population exposed to radiation. The approach of setting limits for exposure of workers and the public is established based on research of the United Nations Scientific Committee on Effects of Atomic Radiation (UNSCEAR) and is developed in detail in the recommendations of the International Commission on Radiological Protection (ICRP). Then, scientifically substantiated by ICRP limits become part of the basic requirements for radiation protection of the International Atomic Energy Agency (IAEA), the directives of the European Commission and the laws of individual member states. Limits for radiation are determined based on scientifically sound risk acceptable to society. The scale of the acceptable risk has the following lines: • exceptionally high level of risk – 10^{-2}; • high level of risk – 10^{-3} – 10^{-2};

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		• medium level of risk - 10^{-4}; • very low risk – 10^{-5}; • negligible risk – 10^{-6}. It is believed that risk lower than $0{,}5.10^{-6}$ (corresponding to irradiation 10 micro Sv per year) is negligible, since it is only about 0.5% of the exposure from natural background radiation. The limits of radiation exposure of the population according to Bulgarian Basic norms on radiation protection that are harmonized with the Safety standard of the International Atomic Energy Agency Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards, GSR Part 3, and with the European legislation – Council Directive 2013/59/ Euratom of 5 December 2013 laying down basic safety standards for protection against the dangers arising from exposure to ionizing radiation, are as follows: - Annual individual effective dose of 1 mSv. - The limits on annual equivalent doses, complying with effective dose limits are as follows: – 15 mSv for eye lens; – 50 mSv for skin (This limit applies to the average dose received on an area of 1 cm^2, regardless of the area of the irradiated surface). Regulation for Safe Management of Radioactive Waste sets even lower annual individual effective dose for the respective critical group of the population during normal operation of the NDF of 0.1 mSv per calendar year.

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		The potential effects of ionizing radiation on the population is analyzed and assessed in the EIA Report. For a quantitative assessment is used methodology, which is well-known in the world based on the recommendations of the US EPA (Agency for Environmental Protection of the USA). The methodology involves four steps described in detail in the Report: 1. Hazard identification 2. Evaluation of the relationship dose-response 3. Exposure assessment 4. Risk characterization **The results of the analysis indicate, that the estimated radiation will not exceed the natural background, the health risk during normal operation of the NDF on the population from the nearest residential area (town of Kozloduy) and village of Harlets is negligible, in other words - zero. No impact on the population in the 30-kilometer zone i.e. also on the residents of Dolj County and in particular Craiova, located at a distance of 60 km from the investment proposal, is expected.**
4.7	As for your today's presentation: I won't pass students defending such a Bachelor Degree's thesis. It has no data, no references, it's not in line neither with the Espoo Convention, nor with the Aarhus Convention.	The assertion that the presentation does not comply with requirements of the conventions is false. In the international legislation - Directive 2011/92/ EU on EIA and the Convention on Environmental Impact Assessment in a Transboundary Context there are no requirements for the form of the presentation, which presents the EIA Report to the public. The Employer considers that he has provided sufficient factual material to clarify in detail to the public the nature of the investment proposal, the state of components and environmental factors, analyses and assessments of the potential impact on the population and environment,

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		as well as the findings and conclusions of experts on EIA thereby made his presentation available to the public. We would like to emphasize that the presentation made during the public discussion can not and should not be considered as a sole source of information. The EIA Report in English was publicly accessible and available to the public on the website of the Romanian Ministry of Environment, Waters and Forests since March 2015.
4.8	I am informed on the 26th May and expected to elaborate comments until the 7th of June, as long as everybody here has jobs. The public in Craiova did not have enough time to figure out what's this all about.	As it was made clear during the public discussion on the 9th of June 2016, the Romanian public was informed about the EIA procedure of the National disposal facility in January 2015, and the full documentation - EIA Report and its Annexes was available for the Romanian public on the website of the Romanian Ministry of Environment, Waters and Forests since March 2015. The EIA Report in English is available also on the website of the State Enterprise Radioactive Waste since March 2015 together with a Stakeholders engagement plan in English and Romanian. Romanian public has not used the Public grievance form applied to the Stakeholder engagement plan.
4.9	A) Even more, I would like to ask the specialists from Bulgaria why is it that the sarcophagus from Chernobyl has cracked after about 30 years? There are funds being raised within the EU, in order to build the biggest movable structure in the world (being involved about 18 000 t of concrete and steel), that should be able to bury the	A) The Chernobyl accident is outside the EIA procedure of the investment proposal for the construction of a National disposal facility for radioactive waste.

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	Chernobyl's sarcophagus. B) Today, we would have liked to see what is the prognosis for the less favourable scenario and what measures will be taken in this situation? C) Moreover, we are wondering: after Chernobyl's disaster, in order to bury the reactor under concrete there have been used about 700 000 Ukrainian and Russian citizens. Will Bulgaria have the necessary human force to do the same in case of a disaster involving the Kozloduy Power Plant? Within today's presentation it wasn't told that we are living in a extremely unstable environment. Initially, one of the terrorists attacks in Belgium was targeting a NPP. Therefore, we can no longer ignore the international impact, but also the fact that these facilities are not endangering only the present citizens, but the future ones as well.	B) It is not clear whether the question relates Chernobyl or the NDF. If it is in relation to Chernobyl, please note that the issue is outside the EIA Report of the investment proposal for construction of a National disposal facility for radioactive waste. If in terms of the NDF, please refer to answer to item 4.12. C) The subject of the present discussion is the EIA Report of the investment proposal of SERAW for construction of a National disposal facility for radioactive waste. However, to be most transparent we would like to assure the Romanian public that, as described in the EIA Report, Kozloduy NPP has been operating without accidents for 40 years. Security of Kozloduy NPP is created and organized in accordance with the Regulation for providing physical protection of nuclear facilities, nuclear material and radioactive substances, Ordinance №7 of physical protection systems of buildings, the applicable requirements of the Bulgarian legislation and Safety standards of the International Atomic Energy Agency. Security of KNPP is continuously monitored by the Nuclear Regulatory Agency and the competent authorities on physical protection of the Republic of Bulgaria and is also subject to international inspections.
4.10	A) We have raised over 15 000 signatures in order to organise a referendum and being asked about our stand on this project. We have stopped at 15 000 because there was	A) This is declarative statement – there is no question concerning the EIA Report

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	no point in exceeding the legal requirement. Today, we have listened enough, for both the official stand and the stand of the ones opposing the project! B) Now, I am asking the citizens of Craiova: are they willing to hear more about this, since I've seen that they do not agree? Because this project is clearly unfeasible and keep that in mind: we are clearly opposing this project!	B) Question to the Romanian public and declarative statement.
4.11	What are the liability measures that have been requested by the Bulgarian Government against the constructors of this project?	On every stage since the beginning of realization of the investment proposal in Republic of Bulgaria are envisaged guarantees. During the construction of the National disposal facility, according to regulations in force concerning construction is required irrevocable guarantee for good performance. One of the requirements of the State Acceptance Commission for commissioning of the facility is the presence of guarantee for the post-construction period, which corresponds to all European standards for construction works of such category sites. During operation of the site, Bulgarian legislation in the Law on Safe Use of Nuclear Energy (ASUNE) has implemented the provisions of the Vienna Convention on Civil Liability for Nuclear Damage (Vienna Convention). The type of warranty will be determined by the Bulgarian government before commissioning of the facility and can be either a government guarantee or civil liability for nuclear damage. In all cases, however, the legislation provides full state responsibility for payment of allowed claims against the operator, even in cases where the nature of the guarantee is civil liability for nuclear damage, but insurance cover is lacking for payment of allowed claims. In this sense, it can be concluded that the Bulgarian government provides constant and unlimited guarantee.
4.12	What are the measures guaranteeing us that there will	The security of the National disposal facility is designed and implemented in accordance with the specifications of the Ordinance for provision of

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	never be a terrorist attack against this site?	physical protection of nuclear facilities, nuclear material and radioactive substances Ordinance №7 of systems for physical protection of constructions, the applicable requirements of the Bulgarian legislation and the Safety standards of the International Atomic Energy Agency. The design is approved by the competent authorities on physical protection in the country including Nuclear Regulatory Agency, Ministry of Interior and the State Agency for National Security. Physical protection is provided by both modern technical security systems, and the continuous 24-hour security on site. The risk of a terrorist attack is evaluated in the Intermediate safety assessment report as beyond design basis accident. Given the nature of the radioactive source - radionuclides are incorporated in solid cement matrix, packaged in reinforced concrete containers and placed in massive reinforced concrete structures, the radiation risk for the population living in the town of Kozloduy, which is at a distance of 2500 meters, is considerably lower than the permissible individual effective dose for normal operation of the facility (0,1 mSv), and as a result of design basis accidents (1mSv) and amounts to $8{,}39.10^{-3}$mSv. The radiation risk to the population of Romania, which is located at a significantly greater distance, is negligible.
4.13	What are the technical details that have not been yet disclosed to us, regarding the life time extension for the nuclear units 5 and 6?	The extension of the operational lifetime of Units 5 and 6 of KNPP is outside the scope of the EIA Report for construction of a National disposal facility.
4.14	In addition, the date and hour have been inadequate in order to assure the possibility for the public in Craiova to participate: the active population is at work, the retired did not know about this and even if they would have known, they were in church. And as an answer to the aforemade	Although disclosure of the date, time and place of the meeting for public discussion of the EIA Report on Romanian territory is not part of the obligations of SERAW, we would like to note, that the Romanian Ministry of Environment, Waters and Forests has proceeded in full compliance

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	comment: during the Thracians' days, there were no NPPs I am not a *„laic citizen*". In the first place, I am the president of the Asociația Civică pentru Viață (the Civic Association for Life) and I have coordinated until recently the Grupul Civic de Acțiune (the Civic Action Group) in Craiova, an organisation that managed to mobilise citizens and to participate to public debates, along with hundreds of citizens – not like the one here, with 3, 4, 5 people in the room – and which managed to get the attention of the local media and more than 15 000 citizens of Craiova. As I was saying, we have stopped within 15 000 signatures, given that we were needing at least 13 000. Regarding the Anne-Maria Simoiu citizen's laicity: I'm an University professor in the Chemistry Department within the Faculty of Sciences and since 11 years ago a chemical weapon expert within the United Nations' Agency in The Hague, Netherlands. Earlier, I was referring to the today's religious holiday. According with the international conventions' provisions, when you choose a date for the public debates, you are considering all the conditions in order to allow the participation of as many people as possible. Are there many people participating to this debate?! I have asked for a concrete answer: not when, but if the representatives of the Bulgarian Government do know about any guarantees that have been requested by the Bulgarian Government in case of a nuclear accident. I am a foreign citizen. I don't live in Bulgaria, I'm holding an information that may be truth,	with the legal requirements of the Republic of Romania Bulgarian side admires Ms. Luminița Simoiu in her position as a president of the Asociația Civică pentru Viață (the Civic Association for Life) and her professional qualifications in areas unfortunately far away from the management of radioactive waste.

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	may be not and its accuracy you need to confirm. I have „*Romanian citizen*" written on my passport and I'm still thinking whether to request also the Bulgarian citizenship. Thank you! I've red the non-technical report. This does not mean that I have not red the others. I have red also the English version of the Bulgarian Supreme Court's resolution, that was posted on the Ministry of Environment's website. I am asking you: how many citizens of Craiova do you think that have technical knowledge on this topic and are therefore able to understand the 3 pages that haven't been translated into Romanian?	As regards guarantees, please refer to answer of question 4.11. Bulgarian side has fulfilled the requirements of the Romanian side presenting the complete EIA Report translated into English, as well as the requested by the Romanian Ministry of Environment, Waters and Forests translations in Romanian language of the Non-technical Summary, Chapter Cumulative effect and Chapter Transboundary impact. Consultations in accordance with the Convention on Environmental Impact Assessment in a Transboundary aspect with experts from the Romanian Ministry of Environment, Waters and Forests and other competent authorities were held for more than a year and the Bulgarian side has answered all questions asked by the Romanian specialists and experts.

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4.15	Even more, according to the information received at the Faculty, it was not mentioned to us anywhere what is the legal basis of today's „*informal meeting*". If you want details on this, we will sit here discussing all night long. The legal basis of this meeting is not being mentioned, neither who are its participants. In order to find out this information, I needed to request it to APM Craiova (the Environmental Protection Agency in Craiova) over telephone. It seems unprofessional to me to announce such an important meeting and omitting to mention what os the legal basis that stands behind it, who is organising it, who are the participants, etc. Because only then there will be a competent public attending, a public that knows who is dealing with. Also, I have never said that I am representing entire Craiova here, only that I am speaking in their name, because most of them did not know about this informal meeting, or if they knew about it – they weren't able to attend it given that most of the active population is working at this time. Therefore, I consider that continuing in this manner it is highly unprofessional and this informal meeting doesn't have the expected professional character of a real debate – from an expert to another. There is also a different kind of public here: I don't know how competent. In this regard, I would like us to conclude here: this here is not more than an informal meeting, according to the Espoo Convention! Please allow us the right to reply. Concerning the fact that we weren't compelled to watch over the Ministry's website, I will start with the following question: how many times are	Although the announcement of the date, time and place of the meeting for public discussion of the EIA Report on Romanian territory is not part of the obligations of SERAW, we would like to note that the Romanian Ministry of Environment, Water and Forestry has proceded fully in compliance with the legal requirements of Republic of Romania. The meeting for public discussion of the EIA Report is scheduled and conducted in accordance with the regulations of the Republic of Romania and the requirements of the Convention on Environmental Impact Assessment in a Transboundary Context. The claim that this is "informal" meeting is not supported by evidence.

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	you, madam, reading through the Craiova University's website? How could the population in Craiova – that doesn't know when the inforrmations are being posted on the Ministry of Environment's website – to check out if any new information, that is concerning us – the citizens, is being posted on the Ministry's website? Secondly, you should know that I have spoken entirely serious, without ridiculising this discussion. The procedure is part of this public debate and we are endorsing that these procedures have not been respected. We have been here starting 09:45. The big advertisment was posted on the Philharmonic's door 5 minutes before the debate and the one in A3 format – with not more than an hour in advance. Does this mean *„informing the public"*?	
5	**Ms. Liliana Babiac**	
5.1	I'm an electronical engineer. This is a stand. The presentation that took over 4 hours was an insult against most of us. We have been considered being of an intelligence under the average and lacking any critical sense. Every allegation within the presentation was entirely harmless, if not even benefical. Not the slightest negative effect against our quality of lives. It is absurd! Therefore, we publicly express our point of view of being against this project, which has been presented in a disastrous manner from each and every point of view when looking to show it in a realistic light. I am mentioning that I am part of the Civic Action Group, that has gathered the signatures. Now, as the group's coordinator, I wish to add that the 15 000 people that have signed for organising a referendum, are	Expressed opinion is against the construction of the National disposal facility for radioactive waste, which is not supported by facts and evidence justifying this position.

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	actually against the project. The number of signatures could have been much bigger, maybe even bigger than the 80% of the population – that was mentioned here by the Mayor. To conclude, Craiova is saying „*NO*" to this project	
6	**Ms. Mariana Barbu**	
6.1	*If the repository is so ecological and lacking any risks – as it was presented by the Bulgarian party – how is it that they didn't position it in Sofia? For some time now we are being suspicious regarding the lack of risks for this project*."	We would like to emphasize that the site where the NDF will be constructed, is subject to a site selection procedure. This question is discussed in detail in the EIA Report. The site selection for construction of RAW disposal facility is subject of respective rules and requirements that are stipulated in detail in the nuclear legislation of the countries that develop nuclear energy as well as in the Safety standards of the International Atomic Energy Agency (IAEA). For the purposes of site selection for the NDF, State Enterprise Radioactive waste has implemented the requirements of Bulgarian legislation, the Safety Standards of IAEA and the good practice for RAW management used in the developed European countries. According to the IAEA standards, the international experience and the good practices for RAW management in the developed European countries, as well as according to the requirements in Art.25, para. 1 of the Regulation for Safe Management of Radioactive Waste, the site selection process goes through four phases, which are described in details in EIAR, Chapter 1, item 1.5 Justification of the site selection, and namely: ⇒ **Phase 1: Development of concept** for disposal and planning the activities for site selection; ⇒ **Phase 2: Data collection and analysing of areas (regions)**, which

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		includes: **a. Analysis of the areas** – analysis and evaluation of the territory of the whole country is performed, exclufind large areas with infavourable conditions for situating RAW disposal facility and establishing areas for analysis which areas are large territories with favourable geological and tectonical, geomorphological (topographical), hydrogeological, engineering and geological, hydrological, climatic and other climatic characteristics. **b. Selection of prospective sites** – the potential sites which meet the criteria for situating facility for RAW disposal are localised in the areas for analysis, then the prospective sites for thorough analysis are identified. ⇒ **Phase 3: Sites characterisation** – the prospective sites are examined thouroughly and one preferred site is selected; ⇒ **Phase 4: Confirmation (approval) of the site** – examinations are performed related to approval of the preferred site. During phase 2 is analysed the territory of the whole country and 12 potential sites are localised from which there were four most prospective sites for NDF selected after multi-factoral analysis. The four sites are: Radiana, Marichin valog, Brestova padina, and Varbitsa. These sites are subject to detailed field and laboratory examinations during Phase 3 - Characterisation of the site. During the implementation of Phase 3, Varbitsa site was dropped from further examination.The sites, which are examined in details, are described in identical way in the report, presented to BNRA. A multi-factoral analysis was conducted for comparing the characteristics of the potential candidate-sites with selected criteria. The criteria are organised in 4 main groups, namely –

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		Safety provided by the natural conditions, Impact of unfavourable processes and fenomena, Probable impact to the environment and the population, Social and economical acceptability. This way the motivated selection of the site for NDF was made, which was described in details in EIAR, Chapter 1.5, item 1.5.1.3. The comparison of the results between the various groups of criteria demonstrates that Radiana site is leading, which means that it is the most favourable site for construction of the NDF. During phase 4 there were conducted the necessary examinations for verifying Radiana site for construction of NDF in compliance with the approved plan for implementation of the activity and the quality assurance programme. The results confirm the selection of Radiana site as most suitable site for construction of NDF. The selection of Radiana site for the construction of NDF was discussed in details in the EIAR. In the EIA report is analyzed in detail the potential impact on the components and factors of the environment and a conclusion is made that the implementation of the investment proposal for the construction of the NDF on Radiana site will not affect negatively air, drinking water, surface water and groundwater, vegetation, agricultural production, soil and agricultural land, subsoil, flora, fauna and others.
7	**Ms. Hărăbor Ana**	
7.1	„I do not agree with constructing the repository, for the following reasons: - it is at an about 60 km away from Craiova – which will need to be classified as a nuclear risk City. - Secondly, the lead contained within the repository's	It is apparent from the reasons for disagreement with the construction of the NDF that **Ms. Hărăbor Ana** is not aware of the investment proposal through its EIA Report or Non-technical summary, and also that she did not track carefully the presentation and the answer provided to the questions.

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	walls, the only element that can stop the nuclear radiations, is not being mentioned. - Thirdly, the risk of cancer illnesses will increase, the nuclear radiations will be cumulated to reaching the allowed dose."	To qualify Craiova, located at a distance of 60 km to the site of the investment proposal as a town with a nuclear risk after it was proven that the **expected radiation will not exceed the natural background of about 0.1 µSv/ h, and therefore the health risk during normal operation the NDF and its closure on the population from the nearest residential area (town of Kozloduy) and village of Harlets, as well as on the population in the 30-kilometer zone is practically zero, is extremely manipulative.** The other explicit conclusion is, due to lack of nuclear radiation there will be no accumulation, i.e. no cumulative impact is expected in the future, that is why no increase in the risk of radiation-induced cancer is expected. Concerning health risks for the population of the town of Craiova, please refer also to answer to item 4.6 As regards the use of lead, please see answer to item 7.2
7.2	I would like to draw your attention on the fact that I have understood from the project that the repository will be built with reinforced concrete. This means that you have in mind the time wise resistance, isn't it? But I did not understand if the waste will be stored within lead containers, because this would really mean that it's safely stored. Also the thickness of the lead layer is important. I have been working on a X-ray diffractometer, that had lead walls for protection. With all this protecting lead, the radioactive dose was 10 times higher than the risk threshold. The device is in the Physics Department of the Craiova's Univeristy and was emitting X-rays, having a high penetration power. But here we are talking about nuclear radiations, emitting energies way bigger than that and we need to bear in mind also the halflife that is very big. My question is: will this repository have lead walls, in order to	The design of the NDF does not envisage the use of lead as a material for protection and decrease of the effective dose of the RAW disposed in the NDF because there is no need of construction of additional defense. It is well known that the concrete is efficient construction material which is widely used as a biological protection for decreasing the dose for personnel and the population. The design of the NDF envisages the RAW packages to be in reinforced concrete containers and the cells themselves to be constructed of solid reinforced concrete. The function of the reinforced concrete containers and reinforced concrete walls, floor and roof slabs of the cells for disposal as biological protection were confirmed by the performed analyzes and assessments of expected doses to workers and the population. The results of these studies indicate that the expected dose is significantly lower than the limit values and does not involve increased risk to the health of any employee or member of the population, namely 18 µSv/yr

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	stop these radiations, because we are talking about a radioactive waste repository.	with admissible 100 µSv/yr, if conservatively assumed that the exposed person lives at the fence of the NDF. Given that the nearest populated area is at a distance of 2500m for Bulgaria and 12km for Romania, this dose is not even possible to be measured as it is thousand times lower than the natural background radiation and practically does not exist. In the international practice for radioactive waste disposal no lead screens are used. The reason for that is the toxicity of lead as a chemical pollutant. Even in case of most economical use of lead screens the pure lead will amount at 100 000 tons. The emplacement of such huge amounts lead will result in a chemical pollution of the close environment with this highly toxic metal. This large mass will load considerably the construction of the repository with all the resulting complications of the structure and will increase the risk for the facility as a whole, while from a radiological point of view no contribution is expected, because even without this lead screen the dose for the populated areas is practically zero. As a result of this, as well as for the purposes of implementation of ALARA principle, there is no reason or necessity from radiological, structural or economic point of view to use lead as a protection layer in the NDF. To the contrary, the use of lead as radiological biological protection would impose additional risk for the facility, the population and the personnel.
7.3	the repository is being built next to the Danube, very close to the underground waters. Our area is exposed to strong earthquakes and I'm hoping that the risks in case of different intensity earthquakes were calculated and taken into consideration. We are talking about a resistance up to grade 9 Richter. And as your Bulgarian colleague was saying	The repository is situated 3.9 km to the south of the right bank of the Danube River. The underground waters are not close to the repository. Actually the bottom of disposal cells is situated at +55.0 m and the groundwater level is situated at an elevation of +33÷+34 m according to the recent data (2013-2014) obtained within a pre-disposal hydrogeological monitoring

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	here, why didn't you choose a rocky area to build this repository, because the area next to Craiova is anything but rocky.	project of the Radiana site. The main source of the seismic hazard for the Kozloduy area is the Vrancea seismic zone in Romania, which is situated at minimum distance of about 240 km from the Radiana site. The design value of the peak ground acceleration (PGA) is assessed for an earthquake with 10000 years return period (one order of magnitude higher than the IAEA requirement for the LILW disposal facility).The PGA is defined for the all earthquakes with a magnitude (after Richter magnitude scale) Mw>6.5 generated by the Vrancea seismic zone including the three strongest earthquakes occurred in 1977, 1986 and 1990 with magnitudes Mw=7.5, Mw=7.2, Mw=7.0 respectively. Globally, the sedimentary (clay) formations are increasingly preferred to rock formations as an environment for disposal of radioactive waste for a number of their advantages in terms of limiting the migration of radionuclides. Usually, the rock formations are characterized by more or less fractured systems, which are potential pathways for migration of radionuclides.
8	**Ms. Soloveanu Doina**	
8.1	„The project forecasts of the environment. What happens though if it exceeds the safety limit of radioactivity ? There was a program where this risk ? If YES What measures radiological involves lowering effect ?"	The Bulgarian legislator has set limits on safety in compliance with the Safety standards of the International Atomic Energy Agency. According to the Regulation for Safe Management of Radioactive Waste, the maximum annual individual dose for the population can not exceed 0,1 mSv/ yr, and the maximum annual individual dose for the population in case of design basis accidents can not exceed 1 mSv/ yr. The question "What would happen if the safety limits are exceeded?", i.e. the radiological criteria, is hypothetical. In Bulgaria, as in any country that obeys the rule of Law, there could not be designed, constructed and

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		operated disposal facility, which contradicts the legal requirements in the country, i.e. disposal facility which does not comply with the radiological safety criteria. The questions concerning risk are developed in the EIA report. In Chapter 5 of the Report are assessed the risks to the environment, population and workers on site of the NDF in case of potential accidents and incidents. In Chapters 3 and 4 of the EIA Report are estimated the health and hygiene aspects of the environment and human health risk, as well as the radiation risk to the population. It is shown that in all reviewed scenarios the risk to people and the environment is considerably lower than the regulatory limits. This is because in the design of the disposal facility are taken all the measures to reduce the risk. The safety of the facility is based on passive safety systems. As described in the EIA Report, this is the protective multi-layer engineering system that is described in detail in the EIA Report. For more information regarding the protective barrier engineering system please refer to item 9.2.
9	**Ms. Mihaela Răisceanu**	
9.1	What were the conclusions for the debates held in Bulgaria and in Romania and the opinion of the Romanian population living next to the Danube?	Within the EIA procedure of the investment proposal for construction of a National disposal facility for radioactive waste, SERAW held consultations with a wide range of stakeholders - over 90, which include competent institutions, institutes, operating companies, NGOs and all populated areas within the 30km zone around Kozloduy NPP. The EIA Report was provided to all municipalities and settlements within this zone. Meetings of public hearings were held in 11 populated areas – village of Harlets and the municipalities that fall within the 30 km zone or are outside that area, but have settlements that fall within this zone. These are the

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		municipalities of Kozloduy, Mizia, Valchedram Hajredin, Oryahovo, Borovan, Lom, Krivodol, Boichinovtsi and Byala Slatina. It can be concluded that the prevailing opinion of the public after the public hearings in Bulgaria is positive and the need for construction of a National disposal facility is recognized. Regarding the attitude of the Romanian public, statements on the renewed EIA procedure before the present public discussion were not presented.
9.2	How will they guarantee that there will be no radiations' emissions and migrations?	The question of the safety of the facility is discussed comprehensively in the EIA Report. The safety and is based on the multi-barrier engineering system described below: • **The first engineered barrier** is the waste form itself, which is cemented radioactive waste, some of which are preliminary put into steel drums with or without super compression. The safety function of the waste form (cement matrix in which the wastes are affixed) is related to the affixing of the radionuclides into the solid phase of the matrix as well as their retention by adsorption and precipitation in the alkaline media of the cement. Under the conditions of Radiana site, the mechanism of degradation of the first barrier is carbonation that is a slow process and determines time resistance of the first barrier of thousands of years. The cement matrix serves also as a chemical barrier which does not lose its safety functions for thousand years. • **The second engineered barrier** is a hydroisolated reinforced concrete container with thick walls, bottom slab and a lid in which the waste is placed with the remaining void space being filled with mortar forming a monolithic form. Concrete container shall allow for the retrieval of waste in the period until the final closure of the NDF, which means that throughout the period of operation the container

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		shall preserve its functional feature for transport and technological operations, including undistorted metal clamps (holds for handling) that are coated with anti-corrosion coating. According to the Technical design of the reinforced concrete container, the operational life of reinforced concrete containers for disposal (functions of isolation and retention) is calculated for the period of disposal of 300 years. Under the conditions of Radiana site, the mechanism of degradation of the reinforced concrete container is carbonation, that is a slow process and determines time resistance considerably longer than 300 years. Reinforced concrete container retains its functions as a chemical barrier for thousands of years. The container is licensed by the Bulgarian Nuclear Regulatory Agency (BNRA) and is manufactured with applying of very strict testing program in accordance with the terms of the license issued by the BNRA and the Safety standards of the International Atomic Energy Agency. • **The third engineered barrier** of the disposal facility consists of the hydroisolated disposal cells made of reinforced concrete, their foundation and closure slabs and the filling material. The safety function assigned to the disposal cell is the retention of potential radionuclide releases from the waste packages by maintaining the cell integrity during the operation of the repository that lasts 60 years, during the repository closure, that lasts 15 years and during the whole period of institutional control that lasts 300 years. According to the Technical design of the NDF, the design life-time span of the structure of the repository is 375 years. Concrete keeps its functions as a chemical barrier for thousands of years. • **The fourth engineered barrier** consists of a massive loess-cement cushion with thickness of 5m on which base the repository is constructed, and the multilayer cover. Besides being a barrier against

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		radionuclide migration, the loess cement cushion increases the thickness of the unsaturated zone and improves the overall ground conditions. The multi-layer protective cover is constructed using natural materials (clay, sand, gravel and etc.), and has a construction which ensures a lot of important safety functions, most important of which are: - Minimize as much as possible the infiltration flow of rain waters through the disposal system ensuring infiltration hydraulic flow below 1.5 L/m^2 per year through the repository modules. - Serve as a barrier against external distortion of the barrier system by humans, animals or vegetation; - Provide protection against long-term erosion agents such as rainfall and wind. • **The fifth (natural) barrier** is provided by the favourable site characteristics. In other words, the radioactive waste is permanently immobilized i.e. included in the solid matrix, additionally secured in reinforced concrete container, placed in the cells of the repository, which are with massive hydroisolated concrete walls, bottom and roof slab and are situated on massive (5 meters) loess-cement cushion, additionally covered with massive multi layer protective cover. Additionally are also applied measures for control, such as conducting radiation control and monitoring, conducting hydrogeological monitoring, conducting geodetic and seismic monitoring, and control of the state of engineering barriers and the repository via the infiltration control system. This is a guarantee that there will be no release of radiation and migration of radionuclides. The above is confirmed by the analyses and assessments in the EIA Report and the Intermediate Safety assessment. Under normal operating conditions, the radiological impact is determined solely by the presence

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		of external radiation, as gas and liquid emissions are excluded. As stated above, the design contains a number of defenses against this radiation. Safety assessments show that even under the most pessimistic case of an individual who permanently resides outside the fence of the NDF i.e at a distance of 140 m of the disposal facilities, the maximum individual effective dose per year is 18 µSv / yr., which is considerably lower than the maximum permissible effective dose that the legislator has defined as safe according to the Regulation for Safe Management of Radioactive Waste, namely 100 µSv / yr. For the population living in the closest populated area – the town of Kozloduy, which is at a distance of 2500m, the dose is virtually zero as the exposure decreases with the square of the distance. In Chapter 5 of the EIA Report are assessed the risks to the environment and the population in case of potential accidents and incidents. For all the assessed cases, the individual effective dose is significantly lower not only than the radiological criteria for cases of accident (1 mSv/year), but also lower than radiological criteria for normal operation.
10	**Mr. Ion Lungu**	
10.1	I will be as short as possible, given that it's quite late. I am really sorry to participate to such a meeting. I have participated to another one, inside the University, in the Blue Room. I have understood that it was concluded back then that this project will be stopped. This project should have been blocked back then, we, the citizens of Craiova and of Dolj County, cannot afford to risk our lives and our children's lives for a distant future involving a nuclear reactor in Kozloduy. Even if being a waste repository, it's still about radioactive substances that will affect the	Expressed opinion is against the construction of a National disposal facility for radioactive waste, which is not supported by facts and evidence justifying this position.

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	population both in Bulgaria and Romania. Were the downsides for the population in Dolj County and in the neighbouring area from Bulgaria ever taken into consideration? Who is going to pay in case of a nuclear disaster? I don't want our children's future to be destroyed. The project should be stopped, in my opinion, and the Environmental Ministries in both countries should publicly declare on whether is there any protocol between them. And we, as citizens of Craiova and Dolj County, as long as no referendum has been organised...I was expecting to find here more people, not just 20 people representing an entire county...in my opinion, the project should be stopped and there is no need for a referendum. I am a member of the International Labour Federation and a citizen of Craiova. I think that the Bulgarian party – which has initiated this project – should draw the conclusions and close the project for good. Thank you for your attention!	
11	**Mr. Florin Mojoiu**	
11.1	Referring to the Bulgarian party: during your presentation, you were mentioning that the radioactivity level will be monitored. Therefore, there is a radioactivity level monitoring system that only you know about and only you will administer. Is this monitoring needed to be done only by the Bulgarian State? I did not understand very clearly whether this monitoring/checks will be made on a regular basis, or in a timely manner.	The system for monitoring is described in detail into the EIA Report. Additionally, within the framework of consultations between the Bulgarian Ministry of Environment and Water and the Romanian Ministry of Environment, Waters and Forests in accordance with the requirements of the Convention on Environmental Impact Assessment in a Transboundary Context is repeatedly answered to the question of the Romanian public. The conducting of continuous radiological monitoring is obligation of SERAW according to the Regulation for Safe Management of Radioactive Waste and Regulation for the procedure for issuing licenses and permits

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		for safe use of nuclear energy. The disposal facility for radioactive waste could not be licensed by the Bulgarian Nuclear Regulatory Agency without the presence of a system for continuous radiological monitoring. The system for radiological monitoring covers the objects of the environment and includes: - Radiation gamma background (measured with thermoluminescent dosimeters (TLD) and field (in situ) measurements); - measurement of specific, or volume radioactivity of key radionuclides in soils; - measurement of specific, or volume radioactivity of key radionuclides in natural waterways - the waters of Danube River; - measurement of specific, or volume radioactivity of key radionuclides in drinking water, -measurement of specific, or volume radioactivity of key radionuclides in groundwater. There is a system of 12 monitoring boreholes (piezometers) installed for control and monitoring of the groundwaters. The monitoring system of groundwater include reference monitoring wells (piezometers) upstream from the cells for disposal of radioactive waste, and control monitoring wells (piezometers), located downstream of the repository cells in the direction of movement of groundwater flow and close to the boundary of the site. A regular water sampling is implemented and the radioactivity of the groundwaters is measured. In addition, as part of the system for radiological monitoring of Kozloduy nuclear power plant (KNPP) are installed a number of monitoring wells (piezometers) which are placed outside of Radiana site, between the boundary and the River Danube, which waters are also subject of analysis. - measurement of specific, or volume radioactivity of key radionuclides in sediments of the Danube River, in the places for taking water samples. - measurement of specific, or volume radioactivity of key radionuclides in

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		atmospheric air. This includes aerosols which are sampled with air sampling devices as well as atmospheric depositions. - measurement of specific, or volume radioactivity of key radionuclides in flora. This includes plants (grass and foliage) and algae from the Danube River, in the places for taking water samples. - measurement of radioactivity in food and agricultural crops. This includes meat and bones from fish from Danube river, milk from cattle raised in vicinity as well as crops from areas in close proximity to the site. Controlled parameters are ambient dose and integral ambient dose of gamma radiation, total alpha activity, total beta and alpha activity, concentration of key alpha, beta and gamma radionuclides in the samples. The system for continuous radiation control of the site includes continuous control of the state of the disposal facility, the status of the engineering barriers and control over potential emissions of the engineered barriers. This is done through control of the infiltration, which is described in detail in the EIA Report. Responsibility for carrying out radiation control and radiological monitoring is responsibility of SERAW in his capacity as license holders. The results from measurements are reported to the competent authority - the Nuclear Regulatory Agency, which also carries out checks (inspections) of the facilities of SE RAW. The competent authorities – Ministry of Health through the National centre for radiology and radiation protection, and Ministry of Environment and Water through Executive Environment Agency and Regional Inspectorate of Environment and Water – Vratsa, verify the monitoring activities of the license holder by own sampling and performing of analyses.
11.2	It was not mentioned any scenario on what will happen in	The question for modeling of emergency scenarios for Kozloduy NPP is

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	case of a nuclear disaster. I am asking this because if this sort of simulation or study does not exist, I don't think that we can objectively talk about a safe power plant or repository.	out of the EIA Report for the investment proposal for the construction of a National disposal facility for radioactive waste. However, we would like to assure you, that the analysis of accidents and incidents is an integral part of safety assessments in accordance with Regulation on the procedure for issuing licenses and permits for safe use of nuclear energy. According to the Bulgarian Act on the safe use of nuclear energy, the licenses for operation of Units 5 and 6 of Kozloduy NPP are reissued upon expiry of the maximum period of 10 years. The Safety assessments are the key documents for issue/ re-issue of licenses for operation. The analysis of accidents and incidents for the National disposal facility for radioactive waste is discussed in Chapter 5 of the EIA Report and in the Intermediate Safety Assessment Report. In accordance with the requirements of the Regulation for Safe Management of Radioactive Waste and Regulation on the procedure for issuing licenses and permits for safe use of nuclear energy, SERAW is obliged to develop an intermediate safety assessment, which is the basic document that proves safety of the facility before the regulatory body - the Nuclear Regulatory Agency. In the safety assessment are evaluated the radiological consequences for workers and the public during normal operation of the facility and in case of accidents and incidents. The results for the individual effective dose are compared with the safety criteria. As discussed above under normal operating conditions of the facility, the radiological impact is determined solely by the presence of external radiation. Safety analysis shows that even under the most pessimistic case of an individual who permanently resides outside the fence of the NDF i.e. at a distance of 140 m of disposal facilities, the maximum individual dose per year is 18 µSv/ yr., which is considerably lower than the maximum permissible effective dose that the legislator has defined as

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		safe according to the Regulation on the Safe Management of Radioactive Waste, namely 100 µSv/ yr. For the population living in the closest populated area – the town of Kozloduy, which is at a distance of 2500m, the dose is virtually zero because the radiation decreases with the square of the distance. After closure of the facility by construction of protective engineering multi-layer cover, the individual annual effective dose for person from the critical group of population (> 17 years) amounts to 0,87 µSv / yr., which is even lower value. The analysis of accidents and incidents include the modeling and analysis of various emergency scenarios: - Drop of container with RAW. The estimated annual individual dose for maximum conservative case - a person of population located constantly on the fence of the repository (i.e. a distance of 140 meters) is 0,062 mSv/ yr., which is significantly lower even from the radiological criteria for normal operation (0,1 mSv/ yr.). For the population in the nearest populated area - Kozloduy, which is a distance of 2500m, the radiological impact is assessed as non-existent. - Human intervention representing detonation of reinforced concrete container, placed in the open (terrorist act on ground). The estimated effective dose for any person of the population outside of the boundaries of the site is $5{,}0.10^{-4}$mSv, which is significantly lower even from the radiological criteria for normal operation (0,1 mSv/ yr.). For the population in the nearest populated area - Kozloduy, which is a distance of 2500m, the radiological impact is assessed as non-existent. - Earthquake - the estimated annual individual dose for a person of the population is 6,55 µSv/ yr., which is significantly lower than the radiological criterion for normal operation (100 µSv / yr.)

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		- Climate change - the estimated maximum individual annual dose for a person of the population is 0,900 µSv/ yr. for dry climate and 0,695 µSv/ yr. for humid climate; in both cases the values are significantly lower than radiological criterion for normal operation (100 µSv / yr.); - Human intervention related to the use of Radiana site after the end of the period of institutional control and release of the site for unrestricted use: (a) settlement of people on Radiana site and cultivation of agricultural produce for own use – the estimated maximum annual induvidual dose is 42.1 µSv/ yr., which is significantly lower than radiological criterion for normal operation (100 µSv / yr.); (b) construction of a road on Radiana site – the estimated maximum annual induvidual dose is 3,29 µSv / yr., which is significantly lower than the radiological criterion for normal operation (100 µSv/ yr.); (c) drilling of a well - the estimated maximum annual induvidual dose is 0,634 µSv/ yr., which is significantly lower than radiological criterion for normal operation (100 µSv / yr.); - Fall of an airplane onto the closed facility – the estimated maximum annual induvidual dose is 5,49 µSv/ yr, which is significantly lower than the radiological criterion for normal operation (100 µSv / yr.); - Terrorist attack related to crash of passenger aircraft onto the facility before the construction of the protective multi-layer cover - the estimated maximum annual individual dose for the population living in the town of Kozloduy, located at a distance of 2500 meters, is 8,39 µSv / yr., which is significantly lower than the radiological criterion for normal operation (100 µSv / yr.); The analysis of accidents shows that the radiation risk is considerably

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		lower than the permissible individual effective dose both for normal operation of the facility (100 μSv / yr.) and as in result of a design base accidents (1000 μSv / yr).
11.3	Hypothetically speaking, and I think that this can really happen, in case of radiation leakage, how fast will this information be found out, in order to rapidly intervene?	Questions related to reaction in case of potential accident or incident are regulated by the Emergency plan that every operator of a nuclear facility must develop according to Bulgarian legislation, international conventions and Safety standards of the International Atomic Energy Agency. The Emergency plan is based on the maximum potential radiological consequences for the personnel, population and the environment in case of accident and determine the measures to limit and eliminate the consequences of an accident, functional responsibilities of personnel in case of emergency situation, as well as interaction with the executive authorities. The Emergency plan is developed on stage commissioning of the nuclear facility based on the evaluation of accidents and incidents analyzed in the safety assessments. Cases of accident involving the release of radionuclides are specified immediately by the staff of the facility. The staff immediately reports to the head of the emergency team and the Nuclear Regulatory Agency. Immediate measures are taken to eradicate the accident.
12	**Mr. Ovidiu Spiridon**	
12.1	It would be great to have both Romanian and Bulgarian citizens informed about the materials that will be stored in this repository. To have available all the information there is about the materials that will be used for this project, in order to be able to have a fair referendum. To know exactly	The required information concerning: (1) radioactive waste which will be deposited in the NDF; (2) reinforced concrete containers containing radioactive waste; (3) materials used for the construction of the NDF, is covered in detail in the EIA Report.

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	what are we voting on! It's useless to talk on things we don't have no information on. This is the question: why aren't we organising a referendum after holding the correct information?	Nevertheless, we present the requested information. *(1) Concerning the radioactive waste which will be disposed in the NDF* Concerning the radioactive waste which will be deposited in the NDF, please refer to answer to item 4.1 of the present document. Once again we want to emphasize that in the National disposal facility will be disposed only low and intermediate level radioactive waste category 2a according to the Regulation for Safe Management of Radioactive Waste. (*2) Concerning materials, which will be used for the construction of the NDF* Concerning materials which will be used for the construction of the disposal facility, please refer to answer to item 2.1 *(3) Concerning the reinforced concrete containers* In terms of the reinforced concrete containers, we present you the following information, which is developed in detail in the EIA Report: The containers for disposal of radioactive waste are reinforced concrete containers with overall dimensions 1950 x 1950 x 1950 mm and useful volume 5m^3. Thickness of the walls is not less than 10cm, and thickness of the bottom is not less than 14cm. In line with the requirements of the Regulation on the conditions and procedure of transport of radioactive material, the RCCs provide equivalent dose rate at the surface ≤ 2mSv/h and equivalent dose rate level at 1m distance from the surface ≤ 0.1mSv/h. The reinforced concrete containers are manufactured from concrete of strength class at least B25 and are provided with a protective coating on the outside. The waste packages have sufficient structural rigidity to stack

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		four of them one above another. The requirements concerning the structural properties of the concrete are as follows: • Strength indices not lower than 25 MPa; • Water impermeability not lower than 0.8; and • Cold endurance class F 100. In addition, the containers are seismically qualified to withstand 0.20g peak horizontal ground acceleration when stacked 4 containers high. The reinforced concrete containers are produced by the staff of SERAW in strict compliance with the requirements of the technical documentation and the quality assurance program. Strict control of their quality is performed with program for tests developed in accordance with BS and requirements of the International Atomic Energy Agency. According to this program, every 50th container is subject of a test program, which includes: → Tests for waterproofing consisting of two types of testing: (1) pouring of the reinforced concrete container with water, mimicking intense rain; (2) filling the volume of the reinforced concrete container with water and stay for at least 48 hours → Test for free fall – the container is dropped onto a flat surface thus imitating the free fall of a filled container; → Tests on Drilling - on the upper surface of the container is dropped a steel rod → Pressure Test - the container is subject to a pressure exceeding five times its own weight → Tests for mechanical failure - falling from a height of 6 meters on a

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		foundation → Tests for mechanical failure - falling from a height of 1 m onto a vertical steel rod → Tests for mechanical failure – onto the container is dropped a steel plate measuring 1m x 1m and with 500kg mass → Tests for fire resistance - the container is placed for 30 min in a burning hydrocarbon fuel at 800ºC → Tests for radiation protection on a specific methodology The containers comply with the requirements of the Regulation on the conditions and procedure of transport of radioactive material and the Safety standards of IAEA and they are certified by the Bulgarian Nuclear Regulatory Agency as containers for transport and disposal. The reinforced concrete containers are part of the multi-barrier system of the NDF. Their disposal resource according to the Technical design (functions for retention and isolation) is calculated to cover 300 years period of institutional control. Under the conditions of Radiana site, the mechanism of degradation of the reinforced concrete is carbonation, which is a slow process and determines durability time considerably longer than 300 years. The protective characteristics of the reinforced concrete containers are provided by the following characteristics of the containers: → The reinforced concrete container has a special external and internal finish. It is alkaline, acid- and corrosion-resistant, thus eliminating the possibility of degradation of concrete due to chemical attack (alkaline or acidic) and prevents the initiation of electrochemical processes that result in corrosion of the metal structure of

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		reinforced concrete container. → In addition to the protective coating, the reinforcement is integral (without welding) and is covered with a sufficiently thick layer of concrete, which provides the necessary corrosion resistance of the container. → The concrete is designed and manufactured with a combined use of the active mineral additives, wherein the respective compressive strength increase from 25 to 75% (above 40 MPa on the 28th day) and the water impermeability is increased by 2 to 7 times in comparison with the common concrete mixtures, which ensures the necessary mechanical stability of the container. → The construction of container provides after filling the internal volume with waste, the lid to close hermetically (waterproof) to the body. In addition, after placing the RAW in the reinforced concrete container, above it is poured a cement-sand mixture. Thus, the waste remains reliably and safely isolated from the environment. → the holds for handling of container have anti-corrosion cover guaranteed for not less than 50 years. Extension of this lifetime may be achieved through inspection of the holds for handling and carry out the necessary restoration measures. Additionally, measures to slow the degradation process of the container, the following operational measures are applied to ensure the prevention of degradation processes until the placement of the RCCs in the disposal cells of the NDF: → The quality of the materials in the production of container should be strictly controlled to prevent materials that could cause massive

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		crystallization in the volume of concrete as a result of alkali-silicate reaction; → The RCCs are stored in places where no direct sunlight on container is allowed; → The RCCs are stored in conditions where is excluded the presence of aggressive chemical compounds (acids and bases), steam or water, increased concentrations of CO_2, S, Cl, Mg and other aggressive agents; → Storing packages in conditions virtually eliminating the conditions for fires and incidents involving the generation of high temperatures; Before and after transportation, a check for mechanical violations of the special insulating coating is made. If necessary, it is recovered;
12.2	Also I wish to say that the Bulgarian party's presentation was very, very brief. We are talking about building a waste repository, for Christ's sake, not an amusement park.	The assertion, that the presentation was too short is subjective and do not reflect the reality. The international legislation - Directive 2011/92/EU on EIA and the Convention on Environmental Impact Assessment in a Transboundary Context, do not include requirements for the form of presentation, which shall be made to the public for the EIA Report. The Employer considers that he has provided sufficient factual and technical material to clarify in detail to the public the nature of the investment proposal, the state of components and factors of the environment, analyzes and assessments of the potential impact on the population and environment, as well as the findings and conclusions of EIA experts, and he has made his presentation available to the wide public. We would like to emphasize that the presentation delivered during the public discussion can not and should not be considered as a sole source of information. The EIA Report in English was publicly accessible and available to the public on the website of the Romanian Ministry of

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		Environment, Waters and Forests since March 2015. Apparently, the person who made this claim has not read the EIA Report or even only the Non-technical summary and that he relies only on the presentation.
12.3	Returning to the topic on concrete, members of my family and a few of my friends are Constructions Engineers. The most performant concrete is the ultra-high performance fibers reinforced concrete, which has an increased durability, but not also its resistance in time. Therefore, 375 years is a quite too much. That's why we need some clear information and a presentation saying: these are the materials we are going to use; and this information should be provided by specialists. You should get this information from specialists and only afterwards we can have a public debate, which can be one in favour of the project, it doesn't need necessary to be against it. If I'm saying that I'm digging it 30 meters deep, casting some concrete in it and we won't have any radiations, would you take my word on it? We made presentations, speak about technical things that we don't know about, but which we can find out. So the question is: we are expecting you to bring clear, technical information, in order to be able to move forward. I have came here in the name of my family, friends and lots of other people that I know, but haven't been able to get here. And I'm sorry to say that it was a really brief presentation, as...a plan. They did not convince me on the project! Honestly, I'm not at all satisfied with what's going on! Maybe the project is good, maybe the repository will be	Concerning materials, which will be used for the construction of the NDF and the durability of the construction, please refer to answer to item 12.1. Concerning the presentation, please refer to answer to item 12.2.

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	done really well. But I will have to leave this place and tell some people about this project. What am I going to tell them? Because I don't know... They will ask me: „*what are those containers made of?*". Well... from some sort of a metal. „*Really? You don't say...*"	
12.4	Another thing, I did not leave this debate by now in order to see a good repository storing radioactive – not nuclear – waste. But if this is only some sort of a dressing and behind this, the goal is to extend the life time of the Kozloduy NPP, then I'm sorry to say it, but I, my family, my friends, are thinking the same about this and we do not agree with such a thing. Today, one of my colleagues has burried her 30 years old child, due to some lung metastases. You don't get this kind of things at such an age	The extension of the operation of Units 5 and 6 of KNPP is not subject to the EIA report of the investment proposal for construction of a National disposal facility for radioactive waste.
12.5	What is the distance between their families and the Kozloduy NPP and repository.	The distance between the National disposal facility or radioactive waste on Radiana site and the populated place - the town of Kozloduy, where the workers of the disposal facility and their families live, is 2 500 meters.
13	**Mr. Cristian Dide**	
	Why there were no Romanian specialists corresponding the Bulgarian ones, participating this public debate?	The question is not directed to the Employer of the investment proposal for the construction of a National disposal facility for radioactive waste. The organization of the meeting for public discussion of the EIA Report for the investment proposal for construction of a National disposal facility for radioactive waste is carried out by the Romanian Ministry of Environment, Water and Forestry in accordance with the Convention on Environmental Impact Assessment in a Transboundary Context and national legislation of the Republic of Romania .
	Which are the 53 NGOs that have been announced by this	The question is to the Romanian authorities - Ministry of Environment,

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	public debate?	Water and Forests
	Were the 5th and 6th reactors upgraded or not? If they were not upgraded, what is their normal lifetime and when are they going to be modernised?	The question concerning the modernization of Units 5 and 6 of KNPP with the aim of extension of their operational lifetime is beyond the EIA Report for the investment proposal of SERAW for construction of National disposal facility for radioactive waste.
	Which are the sources for financing this project, with full details, names and percentages?	The question for financing of the project for construction of the National disposal facility is outside the scope of the EIA Report. Nevertheless, because we would like to be totally transparent, we provide the required information. The project for construction of the NDF is financed from the following sources: - Fund Radioactive waste, which is created in line with the requirements of Chapter 4 Management of radioactive waste, Section 3 RAW management financing, of the Bulgarian Act on the safe use of nuclear energy - International fund for support of the decommissioning of Units 1-4 of KNPP, which is finaced by the European Commission and the donor countries
14	**Mr. Peter Pencev**	
14.1	Regarding Units 5&6, I could inform you on what's going on putting them out of service, at the Supreme Administrative Court's level. In a few words, the Ministry of Environment has decided that it's not necessary to make an impact assessment procedure. I think that documents in this regard have been sent to the Romanian Ministry. I have a good knowledge of these details and therefore, I could add that when their lifetime will be extended, also their power will	The question of modernization of Units 5 and 6 of Kozloduy NPP in order to extend their operational lifetime is beyond the EIA report of the investment proposal of SERAW for construction of a National disposal facility for radioactive waste.

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	be increased up to 104%.	
15	**Mr. Petru Săvescu**	
15.1	It was mentioned that there won't be any nuclear waste and there will be only low and medium activity waste, being in the 2a activity category. The question is: why put it next to Kozloduy NPP and where is this already radioactive waste coming from? The lady here said that there won't be any waste received from third parties. This information has been mentioned within the first presentation.	Concerning the question why is the NDF to be constructed close to KNPP, please refer to answer to item 6.1. Concerning the question where this radioactive waste is coming from, please refer to answer to item 4.2. Regarding the disposal of radioactive waste from third parties, we categorically declare, as described in the EIA Report, that in the National disposal facility will be disposed only radioactive waste that is generated in Bulgaria. No radioactive waste from foreign countries will be disposed.
15.2	There is a risk present. I have worked as a consultant more than 7 years and curently I am working in inspection, evaluation, certification and accreditation since 2012, therefore I cannot allow myself to play with words. I suppose that the person writting this project knows the meaning of the term „*ecologic*" and also knows that using it in Romania, especially in a written form, is a felony. I am telling you this as an inspection and certification director in ecological systems. Only after going through a certification system, including specific instructions and procedures, you are able to claim that you are working in an ecological system. Of course, only after you receive your certification. As I was saying, I'm working on International Systems, European and International Regulations. In respect to everybody in this room, for our colleagues from both Romania and Bulgaria, when I'm talking about this sort of a project, I'm talking about risk management, in	Two basic concepts are mixed-up - the construction of a National disposal facility, for which through the analyses and evaluations made in the EIA Report was proved that the disposal facility is safe for workers of the repository, population and environmental on one side, and certification of ecological systems on the other side. Questions concerning risk are developed in the EIA Report. In Chapter 5 of the Report are assessed the risks to the environment, population and workers on the site of the NDF in case of potential accidents and incidents. In Chapters 3 and 4 of the EIA Report are rated health and hygiene aspects of the environment and human health risk, as well as radiation risk to the population. It is shown that in all examined scenarios the risk to people and the environment is considerably lower than the regulatory limits. This is because in the design of the disposal facility are taken all the measures for risk reduction. The safety of the facility is based on passive safety systems. As described in the EIA Report, this is a protecting a multi-barrier engineering system that is described in detail in the EIA Report.

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	the first place. In every current consolidated management systems, this is the first step.	For additional information about radiation risk, please refer to answer to item 11.2.
15.3	Were the custodians of the Romanian protected areas in the area informed about this project? I am referring especially to the *Confluenţa Jiu-Dunăre* național protected area, which is located at a 5.5 km away from this project, a protected area that I have worked on its management system. My former Biologist colleagues have recorded changes in the adaptation capability of the macroinvertebrates. This problem, along with the big number of cases that have been recorded within the onco-pediatrics departments of the nearby hospitals and with the number of ecological certification requests from this Northern Danube area, are just a few of the reasons I am against this kind of a project. Our health and the other vertebrata's is priceless.	Romanian public, respectively the environmentalists in the Republic of Romania are informed of the intention of Bulgaria to implement the NDF, and the requirements of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo) are applied. The EIA documentation translated into English is presented to the Romanian Ministry of Environment, Waters and Forests, in whose prerogatives is the dissemination of the information to the relevant institutions on the territory of Romania. The full EIA documentation is also available on the website of the Romanian Ministry of Environment, Water and Forestry since March 2015. In the EIA Report and the Report on assessment of the degree of impact is proved the lack of impact of the implementation of the NDF on protected areas (PA) of Natura 2000 and on the population on Bulgarian and respectively on Romanian territory. The cumulative effect is discussed in detail in Chapter 6 of the EIA Report. The NDF is a necessary project that does not endanger in any way the population, the environment and biodiversity and the subject of conservation of the protected areas under Natura2000. The provided multi-level barriers for non-proliferation of radioactivity in the environment, comply with all safety requirements of the national and European legislation and the IAEA. Ministry of Environment and Water, being the national competent authority, has demanded with a letter their Ref. B-981/29. 05. 2014 the preparation of an assessment by qualified experts of the extent of the impact of the investment proposal on the Natura 2000 network, and in

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		particular is required to consider the impact on protected areas of the network which are at risk to be affected. The conclusion of the assessment approved by decision their Ref. OBOC-1/ 09.02.2015 of the Ministry of Environment and Water is that *the investment proposal will not have significant effects on network Natura 2000 presented in the area of the investment proposal, from which comes the logical conclusion that a significant impact can not be expected on the network as a whole.* *No impacts are expected, including cumulative ones, over the subject and purposes for conservation of protected areas of Natura 2000 network, neither on Bulgarian nor on Romanian territory.* In The EIA Report and Report on assessment of the degree of impact of investment proposal on the subject and purposes for conservation of protected areas *are drawn conclusions from various experts assessing the impact of the investment proposal on the individual components and environmental factors that there is no transboundary impacts expected.* With respect to air (no emissions), water (there is no generation of waste water, which to be directly discharged into the Danube, there is no water intake from the river), which is one prerequisite that there is no impact of the investment proposal on these components of the environment, which is a sure guarantee that there will be no impact on the protected areas on Romanian territory, located at a longer distance than the protected areas on Bulgarian territory for which the experts has proved in the Report on assessment of degree of impact that that there will be no negative impact. In the Report on assessment of degree of impact, is concluded, that concerning Natura 2000 protected areas for Bulgaria, namely protected area BG0002009 “Zlatiyata” (located at a distance of 0,45km southwest

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		from the outer border of the Radiana site), BG0000533„Kozloduy Islands" (3,8km north from the NDF site), BG0000614„Ogosta River"(6km east from Radiana site), BG0000508„Skat River" (located 6,3km east from the NDF site) can not be expected cumulative effects associated with the intensification of direct pressure on the zones (direct damage and loss of space in them) as all the areas and facilities of the NDF are outside of the four areas and at a considerable distance to them. Based on the analyses and evaluations made it is justified and concluded that the project will have no direct cumulative effect on the Bulgarian protected areas, even less can be expected cumulative effect in transboundary aspect. The conclusion in the Report of assessment of the degree of impact is that the implementation of the NDF does not imply any direct and indirect effects, and will not be cumulated with those on the closest protected areas on the territory of Bulgaria, no negative transboundary impacts (including cumulative) on the closest protected areas of Natura 2000 in Romania can be expected, which are more remote in the same directions. In the Republic of Romania, on the other side of Danube river, at 5.5 km and 18 km to the north and northwest of the NDF site are located the following protected areas of the European ecological network Natura 2000 (one of them overlaps the other two): 1. Protected area ROSCI0045 „Coridorul Jiului" declared by Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora; 2. Protected area ROSPA0023 „ConfluenţaJiu – Dunăre" declared by

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		Directive 2009/147/EC on the conservation of wild birds 3. Protected area ROSPA0010 Bistreț declared by Directive 2009/147/EC on the conservation of wild birds As a matter of fact, there is no logical reason to expect any further impacts, including cumulative ones, over the subject and purposes for conservation of protected areas that are located beyond the already assessed areas with similar scope and conservation objectives for which it was shown that with applying the relevant mitigating measures in the implementation of the investment proposal will not be affected negatively their protection parameters. In terms of oncological diseases, please refer to answer to item 4.5 Regarding the stated concern that almost the construction of the NDF could hamper the certification of organic production in the north-Danube area we would like to emphasize that: The investor of the project has taken all measures to design and subsequently construct and operate the NDF in a way that ensures safe isolation of radioactive waste from the environment and human biosphere. As it is described in details in the EIA Report, this is based on the characteristics of the site where the disposal facility is located and which is determined after a procedure for site selection, the characteristics of the engineering facility for the disposal of radioactive waste and the characteristics of the protective multilayer cover. It is emphasized many times in the EIA Report that particularly for the NDF SERAW required from the designer to develop the design of the disposal facility so as the precautionary action zone to be limited within the boundary of the site. The EIA Report considers the impact on the components of the environment - air, water, soil, vegetation, incl. agricultural production and

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		it has been proven that the construction, operation and closure of the NDF do not have any negative impact. The cumulative effect of the NDF operation with the other facilities on the KNPP site is analysed in Chapter 6. The absence of cumulative effect and transboundary impact on Romanian territory is proven. The absence of impact on agricultural production from the construction of the NDF and the simultaneous operation of nuclear facilities in the area is proved. The results of the monitoring programs are given covering soils, vegetation, water, agricultural products, food, radiation exposure to the population, showing that, following the long-term operation of KNPP there is not any impact on the agricultural production. In support of the above, we would like to emphasize that in Bulgaria the ecological production is certified in line with the requirements of the Law for applying the common organization of agricultural markets of the European Union and Ordinance № 1 dated 7 February 2013 for applying rules of organic production of plants, animals and aquaculture, plant and animal products, aquaculture products and foods, their labeling and control of production and labeling. In our country we have biologically certified organic farms in the area around KNPP, which is another proof of the lack of contamination of both agricultural production and soil, air and water in these farms. In support of the facts mentioned above and of the assessments made in the EIA Report, we would like to highlight examples from the international experience, which are addressed in the EIA Report. Both French disposal facilities for low and intermediate level waste are located in wine regions and their long-term operation has shown that the sales of wines and agricultural produce are not affected negatively by the presence of disposal facilities in these areas. The Spanish disposal facility El Cabril, which is the reference disposal facility for the NDF, is located in a hunting reserve and the surrounding area is

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		known by the production of ecologically clean honey and olive plantations, which yield high quality olive oil. In close proximity to the disposal facility are located a large pig farm and factory for preparation of the famous Spanish Jamon. The production and sales of these agricultural products are neither influenced negatively by the presence of the disposal facility, but production and exports expand.
15.4	We were talking here about the regulatory body that was in charge of regulating the safety aspect during the election of this site. Who exactly is this body and what was the standard, European or International Regulations was this safety assessment based on?	As described in the EIA report, the competent authority is the Bulgarian Nuclear Regulatory Agency, which controls all the stages of the life cycle of the NDF. BNRA issues: (1) Site selection permit; (2) Order for approving the selected site; (3) Design permit; (4) Order for design aproval; (5) Construction permit (6) Permit for commissioning (7) License for operation (the license for operation is issued with the maximum duration of 10 years which means re-issuing of the license maximum every 10 years) (8) License for closure The licensing regime is described in detail in item1.10 of Chapter 1 of the EIA Report. The site selection and the safety assessments are carried out in accordance with the nuclear legislation in Bulgaria and in particular with the requirements of Regulation for Safe Management of Radioactive Waste and the Regulation for the procedure for issuing licenses and permits for safe use of nuclear energy. These regulations comply with the safety standards of the International Atomic Energy Agency – Near Surface Disposal Facilities for Radioactive Waste, SSG-29; The Safety Case

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		and Safety Assessment for Disposal of Radioactive Waste, SSG-23. Here we cite only the standards of the IAEA concerning siting and safety assessments. Bulgarian nuclear legislation is harmonized with all safety standards IAEA.
15.5	One more thing, I wouldn't want to be misinterpreted. I'm also a chemical and nuclear weapons military expert and I don't think that there's anybody else in this room to have handled that much radioactive material. We do not need to be nervous, even if we are chemists or physicists. I, myself, am a chemist. If you want an answer, think of the people in Fukushima and the risk assessment that was made there. Even so, look at what happened. And when you are presenting a project, please try to make yourselves understood by everybody in the room. You are not talking just to specialists, but to a wide public. We, the people here, together with our colleagues, parents, children, can be threaten. We are all trying to improve the system, we are not against each other. I've seen different opinions here, Romanians against Romanians, Bulgarians against Bulgarians; we did not come here for this. As our colleagues were saying, there's a global threat. At the moment, there are geo-strategical weapons. Think about this! God forbit something bad to happen. We are all threaten. We, the Romanian and the Bulgarian people should join forces. Both the authorities and citizens should make more for us and our countries.	Expressed opinion is not specifically related to the investment proposal of SERAW for construction of National disposal facility for disposal of radioactive waste and the EIA Report.
16	**Mr. Peter Karjilov**	
16.1	According to the International Conventions, our today's	The opinion that the meeting for public discussion can not be regarded as

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	meeting cannot be called a public debate. There wasn't enough time available in order for the public to elaborate comments, not even for the experts. Also, the discussions we are carrying out here cannot be separated from the other connected projects. Of course, there is an indirect relation between the generated waste and the machines that are generating it (the nuclear reactors) and the intension to continue to build nuclear reactors.	public discussion because there was not enough time to enable the public and experts to learn about the materials and prepare their comments, contradicts reality. The EIA Report in English is published on the website of Romanian Ministry of Environment, Waters and Forests in March 2015. Also in March 2015 on the webpage of SERAW was published the English version, while the Bulgarian version was published even earlier. On the website of SERAW was published also a Stakeholder engagement plan in Bulgarian, English and Romanian languages, and no one has used the public grievance form applied to the plan. As pointed out several times above, the extension of the operation of Units 5 and 6 of Kozloduy NPP is out of the EIA Report of the investment proposal for construction of a National disposal facility for radioactive waste. No evidence is presented for existence of any direct or indirect link between safety and environmental impact of the NDF and the safety and environmental impact of the extension of the operation of Units 5 and 6 of Kozloduy NPP, as well as evidence that the characteristics of waste that will be generated during the extension of the operation may differ even minimally from the characteristics of the waste that are generated as a result of 40 years of operation of Kozloduy NPP.
16.2	One more thing that was not mantoned till now: Ms. Stefanova has underlined many times that this project is about low and intermediate level radioactive waste. Our today's topic is referring to burrying this kind of waste. Do you have any idea on what is the percentage of low and intermediate level waste in the one generated by the Kozloduy NPP? Anybody from the Romanian public?...only 3%. Over 90% of the waste is of high activity. Not the	Management of high level radioactive waste is outside the EIA Report of the investment proposal for the construction of the NDF. The approach for the management of high level waste is defined in the updated National strategy for management of spent nuclear fuel and radioactive waste until 2030, adopted by the Council of Ministers in September 2015, which is publicly accessible on the website of the Ministry of energy.

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	Bulgarian Operator, nor the Romanian one, neither the Bulgarian Government, nor the Romanian one, don't have any idea on how they will deal with the nuclear fuel waste. I will give you some clear figures. The first high level waste repository will be built in Finland, and its primary estimated cost is of 3.3 billion €. It is going to be built in solid rock, 400 meters deep. Regarding the French one, on which they are raising money now – given that 25 billion € are needed for it – there are rumours that it will be built inside a clay layer. So please, while we are being acused that we are manipulating the Romanian public, we are asking the ladies and gentlemen representing the State Enterprise Radioactive Waste, to try and answer the following question: how is Bulgaria dealing with the high activity waste?	
17	**Ms. Dumitrescu Ileana**	
17.1	*Why has not it been popularized more public debate*	The question is not within the competence of the Employer. The organization of the meeting for public discussion of the EIA Report of the investment proposal for construction of a National disposal facility for disposal of radioactive waste is conducted by the Romanian Ministry of Environment, Waters and Forests in accordance with the requirements of the Convention on Environmental Impact Assessment in a Transboundary Context and the national legislation of the Republic of Romania.
18	**Mr. Constantin Chirea**	
18.1	I have requested this information meeting's recordings and also the PowerPoint presentations, given that there are some incongruencies between what the translator and	On the website of the Romanian Ministry of Environment, Waters and Forests is published the audio record of the public discussion. The presentations of the Bulgarian side represent part of the Minutes of meeting for the public discussion and will be also published on the

	Questions, proposals, suggestions, opinions and objections expressed by the Romanian public during the public discussion on the 9th of June 2016 in the town of Craiova, Romania	Standpoint and motives of the Employer State Enterprise Radioactive Waste
	what the Government's representative were saying.	website of the Romanian Ministry of Environment, Waters and Forests.
18.2	Where is the funding for both the repository and reactors is coming from	The question for funding of the project for construction of the National disposal facility is outside the scope of the EIA Report. Nevertheless, because we would like to be totally transparent, we provide the required information. The project for construction of the NDF is financed from the following sources: - Fund Radioactive waste, which is created in line with the requirements of Chapter 4 Management of radioactive waste, Section 3 RAW management financing, of the Bulgarian Act on the safe use of nuclear energy - International fund for support of the decommissioning of Units 1-4 of KNPP, which is finaced by the European Commission and the donor countries. The question of the financing of nuclear reactors is outside the competence of the SERAW.
19	**Mr Constantinescu Felix Daniel** **Ms Constantinescu Elena**	
19.1	*We are against building radioactive landfill from the Kozloduy because it affects population health, agricultural production, food*	The expressed opinion represents personal emotional assessment which is unjustified because it is not based on facts and data.