

Warsaw, 22 January 2015

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**Ms  
Christina Bergendorff  
Danish Ministry of the Environment  
Haraldsgade 53  
DK-2100 Copenhagen  
Denmark**

Re: a proposed draft of the strategic document establishing the location for disposing low and intermediate-level radioactive waste

In reply to the letter sent by email on 12 November 2014 forwarding the entire documentation for the proposed draft in question, I hereby present the following information:

The documentation in question has been laid open for the public as set forth in Article 119 (1) of the *Polish Act of 3 October 2008 on making the information on the environment available to the public, environmental protection, social participation in environmental protection and environmental impact assessments* (Journal of Laws of the Republic of Poland (Dz. U.) of 2013, Item 1235, as amended), hereinafter "the Act", and it will be available to the public until the following dates:

- in the Regional Directorate for Environmental Protection in Gdańsk, 21 January 2014;
- in the Regional Directorate for Environmental Protection in Olsztyn, 27 January 2014;
- in the Regional Directorate for Environmental Protection in Szczecin, 11 February 2014.

It should be noted that public comments will be collected and sent promptly after the expiry of the period for provision thereof (as of today, no public comments to the proposed draft document have been received).

The document provided contains information on the planned construction of low and intermediate-level radioactive waste storage sites, which contains more details than the scoping document, and relates in particular to:

- the potential location of the storage sites;
- design concepts for the storage sites (a storage site situated in shallow ground layers, on the surface and at most 30 metres below ground level; a storage site situated in shallow ground layers with boreholes; and a storage site situated in deeper ground layers 30-100 metres below the ground);
- guidelines for creating the storage site;
- an environmental impact assessment of the planned project.

Having analysed the provided documentation, opinions of the Polish National Atomic Energy Agency and positions of the regional directorates for environmental protection, as well as on the basis of the assessment of the impact of the proposed draft on the territory of the Republic of Poland, **we request that you clarify the following issues:**

- the provided document reveals that irrespective of the final decision as to the kind of waste storage site, it is also planned to store (in addition to low and intermediate-level radioactive waste) 233 kg of special waste (radioactive fuel from a research reactor), unless the Danish party finds a partner/country willing to accept the burnt fuel under an agreement. In accordance with the guidelines of the IAEA, it is only short-lived low and intermediate-level radioactive waste that may be disposed of in the disposal storage sites proposed by the Danish party (pursuant to IAEA Surface Disposal, Near Surface Disposal or Boreholes Disposal). Long-lived and burnt nuclear fuel may only be stored in geological disposal facilities. Therefore, the Polish party requests that you clarify what your plan will be should you fail to find a country willing to accept the burnt nuclear fuel. From a formal point of view, the Danish party will not be able to finally manage the aforementioned special waste; therefore it is particularly important to us that you clarify this issue.
- In the event of execution of the project on the island of Bornholm, we believe there is also a possibility of emergency situations and consequences thereof during the transport of waste, e.g. if unfavourable weather conditions occur. The presented document contains the statement "implementing the plan cannot result in any significant cross-border effects"; please clarify this issue.
- The documentation provided emphasises the lack of continuance of geological formations in the location on the island of Bornholm, which in our opinion may create a real risk for underground waters due to the possibility of the radioactive substances leaking through cracks in the substrate. Therefore, we request that you clarify the issue in question (present additional methods of sealing the substrate or of securing it against the indicated risk.)

Furthermore, we request that you inform the Polish party about the next stages of the procedure and send us the documents and information regarding the plan in question. Should a decision be taken to build the waste storage site on the island of Bornholm, we request that you inform the Polish party officially as a party at potential risk and that you take into account and thoroughly analyse the following issues in the scoping document:

- technical characteristic features of the waste storage site;
- the expected significant impact of the project on particular components of the environment;
- which measures are planned to be undertaken to protect the waste storage site against the effects of emergency situations;
- an analysis of consequences of a breakdown that might occur should the radioactive substances from transported or stored waste be released, indicating security measures counteracting the occurrence of emergency situations and preventing the consequences thereof, including the provision of transport safety;
- the range of radioactive impact in case of leakage of waste;
- consequences of the waste leaking into sea waters;
- the scope and manner of monitoring the waste storage site.

We will send our position regarding the necessity to conduct trans-border consultations in the form of a meeting as soon as we receive and analyse the explanations regarding the foregoing issues.

Yours sincerely

[Stamp: Deputy Director  
of the Department of Assessment of Effects on the Environment  
Katarzyna Twardowska]  
[Signature]

Copy to:

- Regional Directorate for Environmental Protection in Gdańsk, ul. Chmielna 54/57, PL-80-748 Gdańsk
- Regional Directorate for Environmental Protection in Olsztyn, ul. Dworcowa 60, PL-10-437 Olsztyn
- Regional Directorate for Environmental Protection in Szczecin, ul. Teofila Firlika 20, PL-71-637 Szczecin
- Polish National Atomic Energy Agency, ul. Krucza 36, PL-00-522 Warsaw
- Polish National Geological Institute – Polish National Research Institute, ul. Rakowiecka 4, PL-00-975 Warsaw