

# Application of Convention to nuclear energy-related activities

- Is extension of designed operation period of NPP subject to Convention if no licence renewal process needed?
- Nuclear energy-related items lack thresholds – gives different legal basis for interpretation of “major change”
- Screening (etc.) based on assessment of transboundary radiological impact
  - normal operation
  - incidents
  - design-base accidents
  - severe accidents beyond the design base
- Does lower boundary on accident frequency range have to be specified and would limit of one millionth per year be reasonable?
- Is risk of accident a screening criteria? Directive vs Convention
- Distinction between types of nuclear energy-related activity: NPP vs final storage

# Notification

- Should expect that many countries may wish to be notified and to participate in transboundary EIA procedure, in part as Convention may provide only legal procedure for potentially affected countries to discuss planned activity
- Notification upon request: Convention vs Directive
- Wide notification, including all neighbouring Parties??
- Use of models/calculations, consideration of shared rivers etc

## Assessment + documentation

- Repeated participation of affected Party vs. legal requirements
- Alternatives, including no-action
- Relationship between EIA and SEA
- Risk of accidents – in EIA? – minimizing environmental impact or reducing nuclear safety risk?
- Other, non-nuclear transboundary impacts
- Volume of documentation
  - What to translate (non-technical summary, transboundary chapter)?
  - Languages (English for whole; national languages)?

## Consultations + PPA

- Confidentiality of security issues – transparency vs simple declaration – reassurance of public?
- Post-project analysis, important given long time lags (consent ... commissioning)

