

Brigitte Artmann
Kreisrätin/Kreisvorsitzende
BÜNDNIS 90/DIE GRÜNEN KV Wunsiedel
Am Frauenholz 22
95615 Marktredwitz/Germany
Tel +49 923162821
Mobil +49 1785542868
brigitte.artmann@gruene-fichtelgebirge.de
www.gruene-fichtelgebirge.de

To the

Haute Commission pour la Transparence et l'Information sur la Sécurité Nucléaire – HCTISN

Via e-mail: hctisn@gmail.com

The independent guarantors Marianne Azario and Isabelle Barthe

Via e-mail: garantes.concertation@suretenucleaire.fr

Marktredwitz, 29 March 2019

Subject: Public consultation on safety enhancements to France's fleet of 900-MWe reactors on the occasion of their 4th periodic safety review

Dear Madam and Sir,

I am a German member of Nuclear Transparency Watch and would like to participate in the public consultation on safety enhancements to France's fleet of 900-MWe reactors on the occasion of their 4th periodic safety review. But unfortunately my French isn't good enough. Therefore I sent my statement in English only by email to the independent guarantors.

The planned lifetime extension of France's nuclear power plant fleet is an important part of France's national energy strategy.

The current public participation procedure is violating the ESPOO and Aarhus Convention.

Energy strategies fall under the Aarhus Convention Article 7 (plans & programmes). In European Law it is the Strategic Environmental Assessment (SEA) Directive. Therefore I ask for a transboundary Strategic Environmental Assessment procedure. The documents should be provided in English language. Better would be German language too.

Further I ask for transboundary Environmental Impact Assessment (EIA) procedures for each NPP that is planned to have a lifetime extension. The Aarhus Convention Compliance Committee already made such a decision in ACCC/C/2014/104 (NL, Borssele).

The expert statement of the Austrian Ministry of Sustainability and Tourism from March 2019 comes to the conclusion that for the 900 MWe reactors a core melt accident with a major release is possible today and will also stay possible after the implementation of the currently envisaged lifetime extension programme!

The experts concluded that severe accidents were not considered in the design stage of the French 900 MWe reactors; the old 900 MWe reactors cannot reach the EPR safety level for prevention and mitigation of severe accidents; the most important lesson from the accident in Fukushima – the risk of hydrogen explosion – was not correctly analysed; the WENRA reference level F is not completely applied; even after the reinforcement the seismic resistance of the filtered venting system will not comply with current safety requirements; etc.

There are no adequate transboundary emergency plans.

<http://www.nuclear-transparency-watch.eu/wp-content/uploads/2015/04/NTW-Report.pdf>

Requests:

- 1. No lifetime extension for the aging French nuclear fleet.**
- 2. Adequate transboundary emergency plans must be published and trained with the real public concerned.**
- 3. A transboundary Strategic Environmental Assessment procedure under the Espoo- and Aarhus Convention for the planned lifetime extension of the French NPP fleet must be done.**
- 4. Transboundary Environmental Impact Assessment procedures under the Espoo- and Aarhus Convention for the planned lifetime extension of each unit of the French nuclear fleet must be done.**

Yours sincerely,

Brigitte Artmann