Open letter of the Ministry of Natural Resources in response to a statement by the Minister of Foreign Affairs of Lithuania about the violation of international standards of the planned NPP construction by the Government of the Republic of Belarus.

Due to repeated statements of the Minister of Foreign Affairs of Lithuania about the violation of international standards of the planned NPP construction by the Government of the Republic of Belarus the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus informs the following.

During the stages of construction planning and NPP designing Belarus adheres strictly to the provisions of international agreements – the Convention on the environmental impact assessment in a transboundary context, the IAEA Convention on the nuclear safety, and it proceeds from the principles of safety, responsibility and good neighborhood.

By expressing it openness to cooperation in 2008 Belarus informed all adjacent states, including Lithuania, about its intentions of carrying out the NPP construction. During preparation of the EIA report the Lithuanian party was asked about the potentially affected territory of Lithuania. In September 2009 Belarus sent the information for the public community and the EIA report to all countries, expressed their intention of participating in the transboundary procedure of environmental impact assessment. In 2009 public discussions and hearings took place in Belarus concerning this issue. In March 2010 the representatives of the competent authorities and organizations of Belarus took part in public hearings in Vilnius by the invitation of the Lithuanian party, and in June 2010 bilateral Belarusian-Lithuanian consultations of specialists of the parties were held in Minsk. The Lithuanian party was represented at the consultations by specialists of various departments and state managing bodies and Seim representatives. Answers were given to questions and remarks of the Lithuanian party both during public hearings, consultations of the specialists and in the course of the correspondence between the competent state bodies of the parties concerned. The Ministry of Natural Resources sent its answers to all the questions asked by the Lithuanian party.

So, the statement of Audronius Azhubalis that the questions of Lithuania about the environmental impact assessment have not been answered is not true.

According to the materials and conclusions of the environmental impact assessment there are no essential harmful impacts on the Lithuanian territory as the result of construction and operation of the planned NPP. The Lithuanian party has not provided any well-reasoned arguments of the essential harmful impacts on the Lithuanian territory yet.

The EIA report contains information about possible threats and risks during implementation of the Belarusian NPP project in the full volume in compliance with the requirements of the Convention on the environmental impact assessment in a transboundary context. The report reads that the Belarusian NPP project complies with all international safety requirements.

The results of accidents modeling at the Belarusian NPP have shown that no protecting measures (evacuation, deactivation of contaminated territories, etc.) will not be required in Lithuania, i.e. the Lithuanian party should not be anxious about the fact that the Belarusian NPP is in 30 km from Lithuania.

The Belarusian NPP construction site was selected in compliance with the IAEA standards – the IAEA safety requirements "Assessment of sites for nuclear units" NS-R-3 and the national legislation. The IAEA standards do not contain any recommendations for the minimal distance of NPP location from large cities. The selection criterion is the guarantee of safety provision. The world practice has numerous examples of NPPs location near big megalopolises. From the point of view of nuclear and radiation safety during assessment of negative consequences for the

environment in case of beyond design-basis basis accidents there is no difference between the Vasaginas NPP and the Belarusian NPP. Availability of densely populated territories, including cities, is not the factor which may prohibit the NPP construction.

Survey materials for three alternative sites for the Belarusian NPP were considered with the participation of IAEA experts in the course of special expert missions (May 6-8, 2008 and December 7-11, 2008).

IAEA experts highly appreciated the volume and quality of geotechnical studies fulfilled by the Belarusian party at each site, as well as they pointed out the executors' professionalism. The experts stressed absence of foundation safety problems at the Ostrovets site.

Belarus also cooperates actively with IAEA in other aspects of the NPP construction, the program of technical cooperation is implemented with the aim of rendering the effective and well-coordinated assistance to our country for establishment and development of the nuclear energy program.

So, the statement of the Minister of Foreign Affairs of Lithuania that Belarus conceals information, refuses to receive any experts is not true.

It should be pointed out that construction of the Belarusian NPP has not been started, yet, because no design documentation for NPP construction is available. Presently, preparative works (residential construction, production base construction, etc.) are carried out in Ostrovets.

The Russian design of the improved safety of the "three plus" NPP-2006 generation has been chosen for construction of the Belarusian NPP. This is an evolution project which takes into account advantages and reveals drawbacks of previous projects of nuclear power plants.

The NPP-92 project selected by Bulgaria on the competitive basis for construction of the Belene NPP is the prototype of the present project. This project selection was approved by the European Union because the project was certified according to the EUR requirements in September 2006. Besides, in accordance with such a design the construction of two NPP blocks of the Kudankulam NPP in India is at the final stage, the tender bids have been won for the Akkuyu NPP construction in Turkey, the same design is implemented at the Baltic NPP, and construction is planned at the Kaliningrad NPP.

All the best features of the "three" NPP-91/99 generation project were taken into account in the NPP-2006 project.

Availability of the reference Tianwan NPP (2 power blocks of NPP-91/99) in China, which has passed the warranty operation period, is the absolute "plus" of the chosen Belarusian NPP project. The Tianwan NPP is considered one of the most ecologically safe and economical plants in the world.

The quality management system of "Atomstroiexport" CJSC was certified in 2003 according to ISO 9001-2000, and in 2006 it was successfully recertified in Bureau Veritas Qualitas International. Therefore, the statement of the Minister of Foreign Affairs of Lithuania that the projects of the Belarusian NPP and the Kaliningrad NPP are experimental is groundless.

At the same time, it should be pointed out that several types of reactors were considered in the materials of the environmental impact assessment in a transboundary context of the Vasaginas NPP: AP-1000 of USA-Japan, EPR-1660 of France, ACR-1000 of Canada, as well as NPP-91/99 of the Russian production, and no information is available about any recently constructed abovementioned American-Japanese and French reactors.

The EPR-1660 project, the analogue of which was considered for construction in Lithuania, is presently used by France for construction in Finland and France. There is no information available about the project reference in the materials of the environmental impact assessment for the Vasaginas NPP.

The construction site for the Vasaginas NPP in Lithuania is planned in close vicinity, only 2 km to the state frontier with Belarus, near the National Park "Braslav Lakes". Water resources of Belarusian-Lithuanian Lake Drysviaty will be used at the Vasaginas NPP.

It should be pointed out that by the present time the following questions of Belarus have been ignored: location of the Vasaginas NPP in close vicinity to the state frontier, because a part of the Belarusian territory is covered by the sanitary protection zone of the project and it cannot be used for economic purposes; changes of the temperature mode and the ichtiofauna of Lake Drysviaty (Druksiai) occurred due to the Ignalina NPP operation; the resultant environmental impact on Belarus by all projects which are already planned and under construction at the Ignalina NPP site.

It was pointed out in the EIA materials for the projects included to the complex of handling and storage of solid radioactive wastes from the Ignalina NPP that accidents may have the most severe consequences. Unfortunately, the Lithuanian party has not assessed the mutual impact of accidents at the projects of the complex.

Belarus calls Lithuania to meet the requirements of international legal regulations, too, and it points out that the Belarusian NPP and the Vasaginas NPP cannot be compared, as no reactor has been selected for the later one, yet, and hence, it is impossible to assess the safety systems. From the point of view of the transboundary impact the Belarusian NPP impact on the territory of Lithuania will be lower than the impact of the Vasaginas NPP on the territory of Belarus.

It should be pointed out that the specialists in the field of nuclear energy from the countries which participated in the environmental impact assessment procedure have no doubts about the safety of the Belarusian NPP.

The Ministry of Natural Resources and Environmental Protection of the Republic of Belarus urges the politicians to assess the decisions taken by the Republic of Belarus concerning the issue of NPP construction exclusively on the basis of the opinion of specialists-scientists working in this field.

First Deputy Minister of Natural Resources and Environmental Protection of the Republic of Belarus

V.V. Kulik