

 **Federal Ministry**
Republic of Austria
Climate Action, Environment,
Energy, Mobility,
Innovation and Technology

ASN (Autorité de Sûreté Nucléaire)

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Vienna, 21.01.2021

The Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology of the Republic of Austria refers to the public consultation concerning the conditions for the continued operation of the 900 MWe reactors beyond their fourth periodic safety review.

Austria would like to express its appreciation that the Autorité de sûreté nucléaire (ASN) has decided to hold a public consultation concerning the draft resolution that ASN envisages issuing, following its examination of the generic phase of the fourth periodic safety review of these reactors.

Austria considers this to be in the spirit of Article 8, para 4, of Council Directive 2009/71/Euratom, as amended by Council Directive 2014/87/Euratom.

Already in 2019 Austria has participated in the public consultation carried out by the High Committee for Transparency and Information on Nuclear Safety (Haut Comité pour la transparence et l'information sur la sécurité nucléaire, HCTISN) regarding the generic phase of the periodic safety review for the 900 MW reactors. Austria has submitted a technical opinion to the HCTISN.

As there is sufficient and convincing evidence that severe accidents with large releases cannot be excluded in nuclear power plants of any design, Austria considers itself a concerned party.

In the case of France's Fleet of 900 MW-e Reactors the designed lifetime of 40 years is well documented. It should be noted, that Austria objects any lifetime extension of nuclear power plants, in principle. In case, such long time operation is envisaged, Austria requests that pertinent European as well as international law is fully respected. Austria would like to refer to Article 8 a, para 2, of Council Directive 2009/71/Euratom, as amended by Council Directive

2014/87/Euratom, as well as to Article 6 of the Convention Nuclear Safety and the Vienna Declaration on Nuclear Safety in this in this regard.

To assess the draft resolution that ASN envisages issuing following its examination of the generic phase of the fourth periodic safety review of these reactor the Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology has commissioned a team of experts.

The findings of the expert team on safety requirements made in 2019 have been re-viewed based on the newly published documents and conclusions are made regarding possibly adverse impact of the life-time extensions on Austria. The Austrian participation serves to assess whether the proposed changes in the reactors can minimize or even prevent significant impacts of severe accidents on Austria.

It should be noted that many changes which are listed in the ASN draft resolution need to be proven with the results of several more studies, which first have to be approved by ASN. For this reason the full scale and scope of safety improvements measures will not be known at the end of the generic part of the fourth PSR.

Again, the experts conclude that even if all safety measures announced by EDF were fully implemented a considerable gap would still remain between the Fleet of 900 MW-e reactors and the EPR in the safety levels achieved.

The Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology of the Republic of Austria fully supports this expert assessment and the conditions formulated.

Hence, Austria requests ASN to take the Austrian comments as well as the expert statement duly into account.

The Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology of the Republic of Austria would appreciate being informed on how the Austrian comments as well as the expert statement are taken into account and would also appreciate being informed about future procedures and the opportunities for Austria to take part in these procedures.

Yours sincerely,

On behalf of the Federal Minister

DI Andreas Molin

Enclosure:

Avis d'experts concernant la consultation sur les conditions de poursuite de l'exploitation des réacteurs de 900 MWe au-delà de 40 ans

Fachstellungnahme betreffend die Konsultation zu den Bedingungen für den Weiterbetrieb der 900-MW-Reaktoren über 40 Jahre hinaus