

**LIST OF
CONSULTATIONS ON THE TERMS OF REFERENCE THE ENVIRONMENTAL
IMPACT ASESMENT, 2010**

**CONSULTATIONS HELD WITH THE AFFECTED PUBLIC, COMPETENT AUTHORITIES,
ORGANISATIONS AND INSTITUTIONS WITHIN THE SCOPE OF CONSULTATIONS ON THE
TERMS OF REFERENCE ON THE EIA**

No	Institution/organisation, SE RAW Letter, Outgoing No, with incoming No of an institution/organisation:	Letter in reply with the outgoing No of an institution/organisation and the incoming No of the SE RAW Expressed Opinions, Recommendations and Remarks	Action
0	European Bank for Reconstruction and Development PMU Incoming No: NDF-PMU-CO-ALL-0046/14.07.09	There should be clearly indicated the maximum volume and area of the entire project. A plan for consultations with the public shall be drafted. The best technologies and practices should be presented. The alternatives should be considered in more detailed way. Social and economic, and labour effects as well as public health and safety should be provided as input information. A sociologist, hydrogeologist and a PR expert should be members of the team involved in the EIA elaboration.	This comment shall be taken into consideration on elaborating the ToR and the EIA Report. The guidance as per the EBRD letter have been taken into consideration in the ToR rev.3 and will be taken in consideration on EIA elaborating.
1	Nuclear Regulatory Agency Outgoing No ГY-АЯР-145/08.05.09	Letter, Outgoing No 71-00-34/28.05.2009 Our Incoming No ГY-АЯР-176/01.06.09 Bulgarian Nuclear Regulatory Agency is not a competent authority on the matter considered.	-
MEW and subordinate departments thereof			
2	MEW Outgoing No ГY-OK-144/08.05.09,	Letter, Outgoing No 26-00-1223/23.06.09 Incoming No ГY-OK-	1. A letter to the Bulgarian MEW Outgoing No ГY-OK-307/16.09.09;

No	Institution/organisation, SE RAW Letter, Outgoing No, with incoming No of an institution/organisation:	Letter in reply with the outgoing No of an institution/organisation and the incoming No of the SE RAW Expressed Opinions, Recommendations and Remarks	Action
	Incoming No 26-00-1223/11.05.09	<p>217/29.06.09</p> <p>The ToR does not meet the structure of the requirements . Information about the Investment Proposal is missing. There is no evidence for notification of the affected town councils, municipalities and population. Information about the planned consultations on ToR is missing.</p> <p>A procedure should be launched pursuant to Article 31 of the Biodiversity Act.</p> <p>A procedure should be launched on environmental impact assessment in transboundary context.</p>	<p>Incoming No 26/00-1223/18.09.09</p> <p>Evidence has been provided for the performed notification of the affected population about the investment proposal and provision of list of the organisations foreseen to participate in the consultations.</p> <p>2. A letter to the Bulgarian MEW</p> <p>Outgoing No ГY-OK-269/24.07.09</p> <p>Incoming No 26-00-1223/24.07.09</p> <p>Provided information on the Convention on Environmental Impact Assessment in Transboundary Context.</p> <p>3. A letter to the Bulgarian MEW</p> <p>Outgoing No ГY-OK-267/20.07.09</p> <p>Incoming No HC3Π 8148/23.07.09</p> <p>Notification pursuant to Article 10 of the regulation on the compatibility assessment</p>
3	<p>Executive Environment Agency</p> <p>Outgoing No ГY-OK-143/08.05.09</p>	<p>Letter, Outgoing No 53-00-2840/29.05.09</p> <p>Incoming No ГY-OK-187/04.06.09</p> <p>Data should be added concerning the RAW, the alternative sites and the best technologies. Information concerning the environmental components should be added. Measures for prevention should be recommended, e.g. RPA and</p>	<p>These have been taken into consideration in the ToR, Rev. 3, and they will be taken into account on EIA elaborating.</p>

No	Institution/organisation, SE RAW Letter, Outgoing No, with incoming No of an institution/organisation:	Letter in reply with the outgoing No of an institution/organisation and the incoming No of the SE RAW Expressed Opinions, Recommendations and Remarks	Action
		MA, integration in the national monitoring network.	
4	<p>Regional Inspectorate of Environment and Waters, Vratsa</p> <p>Outgoing No ГY-OK-147/08.05.09</p>	<p>Letter, Outgoing No B-890/21.05.2009;</p> <p>Incoming No ГY-OK-161/25.05.09</p> <p>Proposals concerning the EIA Report to follow:</p> <p>The alternatives of the sites should be considered and the site selection should be justified.</p> <p>Consultations with the affected public and with the authorities of the Bulgarian Ministry of Health should be held. The protected zones situated in the site proximity should be taken into consideration. Measures for prevention should be specified. Up-to-date data, knowledge and methods of assessment should be used.</p>	The recommendations will be taken into consideration in the EIA Report.
5	<p>Danube region (whose centre is Pleven), Basin Directorate</p> <p>Outgoing No ГY-OK-148/08.05.09</p>	<p>Letter, Outgoing No 2455/02/06.2009</p> <p>Incoming No ГY-OK-192/09.06.09</p> <p>The underground water body in the proximity of the site should be taken into consideration. The prohibitions as laid down in the Waters Act should be taken into consideration with a view to underground water</p>	This has been taken into consideration in the ToR revision and will be included in the EIA Report.

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		preservation. The water sources, facilities and measures for protection of water in the region, which falls within the investment proposal scope, should be taken into consideration in the EIA Report.	
Ministry of Health and the subordinate departments thereof			
6	Ministry of Health Outgoing No ΓY-OK-164/12.05.09	Letter, Outgoing No 26-00-252/30.06.2009 Incoming No ΓY-OK-186/04.06.09 ToR have been agreed.	-
7	National Centre of Radiobiology and Radiation Protection, Ministry of Health Outgoing No ΓY-OK-150/08.05.09	Letter, Outgoing No ΠΔ-02-10-40/18.06.2009 Incoming No ΓY-OK-241/25.06.09 No comments and recommendations	-
8	Regional Inspectorate of Public Health Protection and Control – Vratsa Outgoing No ΓY-OK-157/08.05.09	No response	-
MRDPR – National Road Infrastructure Agency			
9	Regional Road Administration – Road Infrastructure National Agency Outgoing No ΓY-OK-	No response	-

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	156/08.05.09		
Ministry of Culture and the subordinate departments thereof			
10	National Institute for Protection of Cultural Monuments, Ministry of Culture Outgoing No ГY-OK-152/08.05.09	Letter, Outgoing No 1316/09.06.2009 Incoming No ГY-OK-198/12.06.09 No objections against the scope and contents of the EIA Report	-
11	Regional Historic Museum - Vratsa Outgoing No ГY-OK-155/08.05.09 Outgoing No ГY-OK-210/26.06.09	Letter, Outgoing No 27/03.06.2009 Incoming No ГY-OK-190/05.06.09 Availability of tangible cultural values in the region covered by the investment proposal Letter, Outgoing No 33/02.07.09 г. Incoming No ГY-OK-230/06.07.09 Proposal for cooperation, to-be archaeological excavations and promotion of the Thracian tumulus.	A contract has been closed, the results will be presented in the EIA Report.
Ministry of Agriculture and Food and the subordinate departments thereof			
12	Zemedelie (Agriculture) – Kozloduy Municipal Office Outgoing No ГY-OK-163/12.05.09 Incoming No 284/10.06.09	Incoming No ГY-OK-253/14.07.09 Information has been provided to the SE RAW as regards the real estates №, type of property, STP and area. The EIA Report should be based on the up-to-date	This has been taken into consideration in the ToR revised version.

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		restitution map on the land of the village of Harlets and measures should be taken to change the statute of the site lands.	
13	Zemedelie (Agriculture) Regional Directorate – Vratsa to the Bulgarian Ministry of Agriculture and Food, Outgoing No ГY-OK-153/08.05.09	Letter, Outgoing No 747/26.05.2009 Incoming No ГY-OK-174/30.05.09 The EIA Report should be based on the up-to date restitution map. A procedure should be launched for change of the designation of the farm lands pursuant to the Farm Land Protection Act.	This has been taken into consideration on the ToR revision. The recommendations will be taken into consideration in the EIA Report.
14	State Forestry Agency Incoming No 92-215/29.06.09	Letter, Outgoing No 92-215/17.07.09, Incoming No ГY-OK-279/23.07.09 Guidance is provided for implementation of a procedure of exclusion of the real estates from the forests stock.	The recommendations will be taken into consideration in the EIA Report.
15	State Forestry Agency, Regional Forestry Agency - Berkovitsa Outgoing No ГY-OK-149/08.05.09	Letter, Outgoing No 13r-19/01.06.2009 Incoming No ГY-OK-188/04.06.09 Forest taxation data are provided. The report should be in line with the up-to date restitution map and forest	The information and recommendations will be taken into consideration in the EIA Report.

No	Institution/organisation, SE RAW Letter, Outgoing No, with incoming No of an institution/organisation:	Letter in reply with the outgoing No of an institution/organisation and the incoming No of the SE RAW Expressed Opinions, Recommendations and Remarks	Action
		<p>taxation data for plantation.</p> <p>Letter, Outgoing No НДГ-08/13.07.09</p> <p>Incoming No ГY-OK-266/17.07.09</p> <p>Guidance is provided for implementation of a procedure of exclusion of the real estates from the forests stock.</p>	
16	State Forestry Agency - Oriahovo	<p>Outgoing No 617/06.07.09</p> <p>Incoming No ГY-OK-243/09.07.09</p> <p>Forest taxation data are provided. Guidance is provided for implementation of a procedure of exclusion of the real estates from the forests stock.</p>	The information and recommendations will be taken into consideration in the EIA Report.
17	<p>Napoitelni Sistemi (Irrigation Systems) Plc. - Vratsa</p> <p>Outgoing No ГY-OK-154/08.05.09</p>	Availability of an irrigation channel in the region covered by the site; it is foreseen to be functional in the future, too.	This has been taken into consideration in the ToR revision. Holding of consultations on spot. A decision is to be found.
Non-governmental Organisations			
18	<p>Za Zemiata (For the Earth) Ecological Association</p> <p>Outgoing No ГY-OK-151/08.05.09</p>	No response	-
Local Administration			
19	Mayor of the village of	Letter, Outgoing No	-

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	<p>Harlets</p> <p>Outgoing No ГY-OK-176/29.05.2009</p>	<p>338/24.06.09 г.</p> <p>Incoming No ГY-OK-220/29.06.09</p> <p>No comments and recommendations</p>	
20	<p>Mayor of the Kozloduy Municipality</p> <p>Outgoing No ГY-OK-146/08.05.09</p>	<p>No response</p>	-
21	<p>Mayor of the Vratsa Municipality</p> <p>Outgoing No ГY-OK-288/17.08.09</p> <p>Incoming No 9100-12445/18.08.09</p>	<p>Letter, Outgoing No 9100-12445/04.09.09</p> <p>Incoming No ГY-OK-329/07.09.09 The letter has been put at the information board of the Vratsa municipality and published at the municipality website. There haven't been submitted any caviats and complaints at the Vratsa municipality so far.</p>	-
22	<p>Mayor of the village of Varbitsa</p> <p>Outgoing No ГY-OK-289/17.08.09</p>	<p>No response</p>	-
23	<p>Vratsa Municipality</p> <p>Outgoing No ГY-OK-329/07.09.09</p>	<p>Outgoing No 9100-1244511/04.09.09</p> <p>Incoming No ГY-OK-329/04.09.09</p> <p>The letter has been put at the information board of the Vratsa municipality and published at the municipality website. There</p>	-

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		haven't been submitted any caviats and complaints at the Vratsa municipality so far.	

CONSULTATIONS HELD WITH INSTITUTIONS AND COMPETENT AUTHORITIES TO ACQUIRE ADDITIONAL INPUT DATA FOR THE EIA REPORT

No	Institution/Organisation, Letter of SE RAW Outgoing No	Subject	Reply Incoming No of the SE RAW Outgoing No of the Institution/Organisation	Status of the Information
MEW and the subordinate departments thereof				
1	Basin Directorate, the Danube region – Pleven, Outgoing No ГУ-ОК-139//07.05.09	Request for access to public information – water sources, Kozloduy municipality	Incoming No ГУ-ОК-196/11.06.2009 Outgoing No ЗДОИ 176/26.05.09 Incoming No ГУ-ОК-171/29.05.2009 Provided unlimited access to the announced public information	Received
2	MEW Outgoing No ГУ-ОК-140/07.05.09 Incoming No ЗДОИД-7485/07.05.09	Request for access to public information – Kozloduy NPP EIA	Incoming No ГУ-ОК-180/02.06.2009 Provided unlimited access to the announced public information	Received
3	Regional laboratory, Pleven, Executive Environment Agency	Protocols from mobile automated stations 2008 for	Incoming No ГУ-ОК 256/15.07.2009	Received

No	Institution/Organisation, Letter of SE RAW Outgoing No	Subject	Reply Incoming No of the SE RAW Outgoing No of the Institution/Organisation	Status of the Information
	(EEA) Outgoing No ГY-OK- 213/26.06.09 EEA Outgoing No 219/30.06.09 Incoming No 53-00- 3490/02.07.09	control of ambient air in the Kozloduy district, 2008 protocols		
4	EEA Outgoing No ГY-OK- 196/12.06.09	Request for input data for EIA-R – annual reports on radioecological monitoring	Incoming No ГY-OK-229/ 06.07.2009 Provided unlimited access to the announced public information	Received
5	MEW Outgoing No ГY-OK- 208/26.06.09	Natura 2000 for the four alternative sites	Incoming No ГY-OK-260/ 17.07.2009	Received
6	Danube Region basin Directorate - Pleven, Outgoing No ГY-OK- 216/26.06.09 Basin Directorate, Danube Region - Pleven, Outgoing No ГY-OK- 228/02.07.09	Water sources, Vratsa municipality. On request of the Danube Region Basin Directorate BD, a second letter has been sent, containing the coordinate register of the potential candidate sites	Incoming No ГY-OK-258/ 16.07.2009 Provided unlimited access to the announced public information	Received
Ministry of Agriculture and Food and the subordinate departments thereof				
7	Agriculture Municipal Bureau, the town of Kozloduy, Outgoing No ГY-OK- 171/18.05.09	Land ownership sketches		Received

No	Institution/Organisation, Letter of SE RAW Outgoing No	Subject	Reply Incoming No of the SE RAW Outgoing No of the Institution/Organisation	Status of the Information
8	Agriculture Regional Directorate – the town of Vratsa	Drafting plans for real estates by the State Land Fund for study on NDF site selection	Incoming No ГY-OK-231/ 06.07.2009 г.	Request to the minister of agriculture and food
9	Irrigation Systems Plc. – Vratsa branch Outgoing No ГY-OK- 166/16.05.09	Request for an opinion on the statute of the M-1 main irrigation channel	Incoming No ГY-OK-164/ 27.05.2009	Received
10	Irrigation Systems Plc., Vratsa Outgoing No ГY-OK- 211/26.06.09	Availability of irrigation systems at the alternative sites	Incoming No ГY-OK-257/ 15.07.2009 Outgoing No 655/13.07.09 г.	Received
11	State Forestry Agency – SFA to the Council of Ministers Outgoing No ГY-OK- 209/26.06.09	Guides for a procedure on the change of the purpose of forests and lands of the forests fund. - Procedure according to the protocol of the Forest Act - Opinion on the Investment Proposal from a forestry point of view	Incoming No ГY-OK-279/ 23.07.2009 SFA Outgoing No 92- 215/17.07.2009	Received
12	State Forestry Agency, Oriahovo Outgoing No ГY-OK- 212/26.06.09	- Map with districts/sub-districts and taxation description of the affected districts/sub- districts; - Opinion on the Investment Proposal from a forestry point	Incoming No ГY-OK-272/ 20.07.2009	Received

No	Institution/Organisation, Letter of SE RAW Outgoing No	Subject	Reply Incoming No of the SE RAW Outgoing No of the Institution/Organisation	Status of the Information
		of view		
13	Regional Forests Directorate, Berkovitsa Outgoing No ГY-OK- 214/26.06.09	- procedure under the Forestry Act - Opinion on the Investment Proposal from a forestry point of view	Incoming No ГY-OK-266/ 17.07.2009 Outgoing No НДГ- 08/13.07.09	Received
Kozloduy NPP Plc.				
14	Kozloduy NPP Outgoing No ГY-OK- 195/12.06.09	Request for input data for the EIA-R – annual reports on radioecological monitoring	Incoming No ГY-AEИ -216/ 26.06.09	Received
15	Kozloduy NPP Outgoing No ГY-OK- 213/26.06.09	- capacity, collector shafts, options for discharge in Kozloduy NPP the sewerage network “Kozloduy” - plans of Kozloduy NPP for use of the pipeline to M-1 channel for emergency water supply of Kozloduy NPP Units 1-4	Incoming No ГY-AEИ- 269/20.07.2009	Received
16	Kozloduy NPP Outgoing No ГY-OK- 215/26.06.09	motor vehicles, Thermal Power Plant -TPP, local meteorological data for the period 2004- 2008	Incoming No ГY-AEИ 240/09.07.2009 г.	For motor vehicles - received. For the TPP – no response. The local meteorologic al data are

No	Institution/Organisation, Letter of SE RAW Outgoing No	Subject	Reply Incoming No of the SE RAW Outgoing No of the Institution/Organisation	Status of the Information
				provided only in the annual reports on monitoring
17	Kozloduy NPP Outgoing No 224/01.07.09	Support plan	Incoming No ГY-AEIQ249/13.07.2009	The detailed site development plan – town-planning and build up plan has not been approved it is not legally binding and applicable
Bulgarian Nuclear Regulatory Agency				
18	Bulgarian Nuclear Regulatory Agency Outgoing No ГY-OK-186/04.06.09	Data from the safety reports – hydrometeorological, radiation monitoring		Received from Kozloduy NPP
Ministry of Regional Development and Public Works and the subordinate departments thereof				
19	Agency on Geodesy, Cartography and Cadastre (AGCC), Bureau on geodesy, cartography and cadastre - Vratsa Outgoing No ГY-OK-167/16.05.09	Request of a sketch of land ownership	Incoming No ГY-OK-173/30.05.2009 Service cannot be provided to the AGCC - Vratsa. The site of interest is situated in the Agriculture and Forests Municipal Bureau, the town of Kozloduy	RAW SE sends a letter to the of Agriculture and Forests Municipal Bureau, the town of Kozloduy and receives the requested ownership sketch

No	Institution/Organisation, Letter of SE RAW Outgoing No	Subject	Reply Incoming No of the SE RAW Outgoing No of the Institution/Organisation	Status of the Information
20	Central Laboratory on Roads and Bridges, Road Infrastructure National Agency, Outgoing No 271/31.07.09 Incoming No YJI-1057- 0962/18.08.09	Road traffic, diagnosis and forecast of the road network of the Republic No 15 – Borovan-Oriahovo and No 11 – Harlets- Kozloduy	Incoming No GY-OK-309/ 19.08.2009	Received
Ministry of Health and the subordinate departments thereof				
21	National Centre of Radiobiology and Radiation Protection, Ministry of Health Outgoing No GY-OK- 194/12.06.09	Request for input data for the EIA Report – annual report on radioecological monitoring	No response	
Local Administration				
22	Water Supply and Sewerage, the town of Kozloduy Outgoing No GY-OK- 206/22.06.09 Incoming No 83/23.06.09	Water Supply and Sewerage facilities, sanitary protected areas, easement areas	Incoming No GY-OK-226/ 01.07.2009 Outgoing No 90/30.06.2009	Received
23	The town of Kozloduy, the Mayor Outgoing No GY-OK- 304/28.08.09	Request for a spot for piling of earth masses at the territory of the Kozloduy municipality		

**CONSULTATIONS UNDER THE PROCEDURE ON THE ENVIRONMENTAL IMPACT
ASSESSMENT ACCORDING TO THE CONVENTION ON ENVIRONMENTAL IMPACT
ASSESSMENT IN TRANSBOUNDARY CONTEXT**

No	Proposal of Romania	Answer

No	Proposal of Romania	Answer
1	The EIA Report should conform to the documentation on the EIA contents as stipulated in Annex II of the Espoo Convention.	This requirement has been met. The EIA Report contents meets the requirements of the Bulgarian regulations on EIA, which, for their part, meet the requirements as stipulated the Espoo Convention.
2	The aptness of such a facility for RAW disposal to be approved shall depend on the arguments presented in the Safety Assessment Report (meeting the IAEA-defined requirements) regarding the location and the engineering activities related to the facility (e.g. waste type, system of engineering barriers; characteristics and location); it shall also depend on the results from the assessments on security and management so as to guarantee quality in all aspects of security.	We agree. The assessment of the radiation effects during the operation, closure and post-closure periods in the EIA Report will be based on the preliminary safety assessment report.
3	Relevant assessment should be performed pursuant to Article 6.3. of the directive on habitats. Our requirement is to present a map with the location of the project in respect to the areas covered by the Natura 2000 Networking Programme.	Agreed. The coordinates of the Radiana site are presented in the ToR for EIA. A map showing the location of the project in respect to the areas covered by the Natura 2000 Networking Programme will be included in the EIA Report, since this requirement is subject of EIA.
4	Aspects which are to be treated by the Bulgarian party in the EIA Report	
4a	Waste waters generation during the operation of the facility – quantities, methods of storage/treatment, if any, as well as long-term decisions for waste management, including during the post-closure period.	This has been included in the ToR for EIA Report (Section 1.2.10 of the EIA Report structure and Section 1.7.2 of the investment proposal characteristics)
4b	Elaboration of a programme of prevention and action in case of contamination due to an incident ensuing from hazardous meteorological phenomena or damages of the disposal facility.	This has been included in the ToR for EIA Report (Sections 1.2.5 and 1.2.8 of the EIA Report structure)
4c	Having in mind that the floods in the Danube bed and its derivatives or the high intensity of precipitation can also cause contamination, in the studies for the EIA	The site selection procedure meets the requirements defined in the Bulgarian Regulation on Safe RAW Management and also of the Regulation on Guaranteeing NPP Safety.

No	Proposal of Romania	Answer
	<p>there should be included characteristics of the Radiana site in respect to floods and seismicity; the geotechnical and the above proposed activities should be included in the risk based on the site location.</p>	<p>The site selection criteria applied by the SE RAW are in compliance with the IAEA requirements and recommendations. The sites endangered by floods, high precipitation intensity, severe earthquakes, landslides, etc. have been excluded at the stage of study. The design of the National Disposal Facility for Low and Intermediate Level Waste will be quite specific. The design will be in compliance with the characteristics of the Radiana site to guarantee long-term geotechnical stability of NDF, insulation of the RAW from the environment maintaining the radiological effects on the population at acceptable levels as established by the regulations according to the ICRP. All mentioned above will be adequately included in the EIA Report.</p>
4d	<p>In the notification letter it is not clearly defined the depth of the disposal facility excavations and whether the NDF will be entirely under the ground surface; from this point of view the hydrogeological data presented are quite insufficient and it is necessary to present studies, on the basis of data from hydrogeological drills, which show the depth of the regional aquifer, located in a Pliocene aquifer (which delivers water to some places in Romania) and the lithological column of the site.</p>	<p>It is included in the Tor for EIA Report, detailed information will be provided in the EIA Report.</p>
5	<p>Which are the additional effective doses of the population, generated by the specific for the different operation scenarios (transport number, type of fuel, etc.)</p>	<p>The effective dose caused by Kozloduy NPP is included in the ToR. The EIA Report will comprise the radiation effects due to the facility normal operation and, as required by the Regulation on Environmental Impact Assessment, the cumulative effect will be considered, e.g. the additional effective doses of the population ensuing from the normal operation of all the facilities (Kozloduy NPP + NDF). This is included in the ToR (Section 4.3.2 of the EIA Report structure)</p>
6	<p>The radiological impact assessment for the population in the area and in case of accident occurred in the following circumstances; incident during transportation, floods,</p>	<p>This is included in the ToR (Section 4.3.4 of the EIA Report structure)</p>

No	Proposal of Romania	Answer
	earthquake, torrential rains and terrorist attack.	
7	In the proposed location assessment, to be considered also the potential impact in the context of flow changes and characteristics of the Danube course as a result of climate changes that are in progress.	This is included in the ToR (Section 4.3.3 of the EIA Report structure)
8	Is the investment notified under Article 37 of the EURATOM Treaty?	No, it isn't. The notification pursuant to Article 37 of the treaty with Euratom will be done a year earlier than the free-release limits defined by the Bulgarian Nuclear Regulatory Agency, this will be done at a later stage of the investment process.
9a	What is the volume of low and intermediate level waste accumulated so far at the Kozloduy NPP site?	In the ToR there has been indicated the total volume of low and intermediate level waste, which will be disposed of at the National Disposal Facility for low and intermediate level waste. The volume of the waste accumulated is indicated in the third National report on Fulfillment of the Obligation under the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management. If necessary, this information can be included in the EIA Report.
9b	What is the volume of low and intermediate level institutional waste (waste from medical applications, agriculture, etc.) having been accumulated so far?	The volume of the waste accumulated is indicated in the Third National Report on Fulfillment of the Obligation under the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management. If necessary, this information can be included in the EIA Report.
9c	How many module stages are foreseen between the first stage and the full capacity stage (138 200 m ³) taking into consideration that NPP will also be decommissioned?	This has been included in the ToR for EIA Report (Section 1.8 of the investment proposal characteristics), more detailed information will be provided in the EIA Report .
9d	The final disposal facility for inventory of low and intermediate level waste has been designed only for low level short-lived RAW generated at the territory of Bulgaria?	Yes, the national facility is designed for disposal of low and intermediate level waste generated at the territory of Bulgaria and included in Section 1.4 of the investment proposal characteristics.
10	What measures are foreseen against possible terrorist attacks regarding the 30 ha site of	As described in Section 1.3.2 of the investment proposal characteristics, the security measures

No	Proposal of Romania	Answer
	the national repository?	are according to the requirements defined in the Regulation on Ensuring Physical security of Nuclear Facilities, Nuclear Material and Radioactive Substances. The measures will be described in more detail in the EIA Report (as described in Section 1.2.5 of the EIA Report structure).
11	Impact assessment in compliance with the best international practices in this field and the deadlines for closure and the disposal facility's post-closure period, not only for the period of construction, but also during the NDF operational phase as indicated in the notification letter.	It is included in the ToR for EIA Report (Sections 4.3.3. and 13 of the EIA Report structure).
12	The relation between the aquifer of the Danube and the assessment of the impact of the Danube during all the phases of the national repository.	This information is included in the ToR for EIA Report (EIA Report structure) and will be considered in detail in the EIA Report.
13a	Performance of environmental studies of environmental radiation factors during the pre-operational stage of disposal facility construction in the adjacent to Kozloduy NPP region at Romanian territory.	SE RAW plans to perform a study of the environmental radiation factors in order to acquire basic information in compliance with the IAEA recommendations as specified in the Safety Reports Series No.35 Surveillance and monitoring of near surface disposal facilities for radioactive waste. This does not include Romanian territory, which will not be affected by the multi-barrier disposal facility. Moreover even Kozloduy NPP does not perform studies of the environment in Romania.
13b	Performance of environmental studies of the geological formations in Romania in the region adjacent to the disposal facility by testing of special boreholes drilled to this end.	<p>SE RAW performs detailed geological studies of the Radiana site. The geological condition of the site together with the disposal facility design excludes radionuclide migration beyond the vicinity in the immediate proximity of the disposal units.</p> <p>Performance of any geological studies is not within the plans of the SE RAW as there are no real reasons for similar studies.</p> <p>Such Romanian-Bulgarian programme for joint studies at both banks of the Danube was implemented in the 80s of the last century.</p>

No	Proposal of Romania	Answer
13c	Performance of joint hydro-geological studies using tracers as rhodamine and two-colour potassium to define the underground waters circulation at the Romanian-Bulgarian boundary.	SE RAW plans to perform pre-operational hydrogeological monitoring programme in accordance with the international recommendations and good practices regarding the acquisition of more precise information on underground waters circulation, including the end points of discharge and water flow monitoring. The requirements to the monitoring programme will be described in the EIA Report. The implementation of this programme will cover the phases of the NDF construction and operation.
13d	Performance of local meteorological studies of the NDF region, including the border area to of Romania.	SE RAW plans to perform pre-operational meteorological monitoring programme, covering the Radiana site and the area in the vicinity of Kozloduy NPP. There will be used information provided by the existing purposely installed by Kozloduy NPP meteorological stations and by the local station to be installed at the Radiana site by the SE RAW. The requirements to the monitoring programme will be described in the EIA Report. The implementation of this programme will cover the stages of the NDF construction and operation.
14a	Determining the coefficients of distribution of the main radionuclides from the radioactive waste for the drill samples of clays and loess at the NDF site.	During the studies for the site selection the coefficients of distribution of the main radionuclides in the samples of loess and clays were determined. The data acquired will be included in the EIA Report as stated in Section 3.2. of the EIA Report structure.
14b	Justified by the Bulgarian party content of long-lived radioisotopes, which will be stored (C^{14} , Cl^{36} , Nb^{94} , Ni^{59} , separately uranium and transuranium radionuclides).	<p data-bbox="820 1503 1406 1648">During the studies for the site selection the SE RAW performed a characterization of the radioactive waste for disposal in respect to long-lived radionuclides.</p> <p data-bbox="820 1682 1406 1794">The data acquired will be included in the EIA Report as stated in Section 1.2.9 of the EIA Report structure.</p>
15a	Agreement with the Bulgarian party on joint action for prevention of NDF incidents and accidents starting from the NDF design phase.	Bulgaria has ratified the Convention on Nuclear Safety and the Convention on Assistance in the Case of a Nuclear Accident or Radiation Emergency and implements all the measures as required.

No	Proposal of Romania	Answer
		<p>In addition to that the Bulgarian Nuclear Regulatory Agency plans to implement, together with the Romanian agency, a project for joint prevention of incidents and accidents.</p> <p>As per the nuclear regulations it is required for the NDF design to comprise all the measures for accident prevention. An emergency plan will also be elaborated.</p>
15b	Agreement with the Bulgarian party on certain joint actions for reduce and prevention of NDF accidents (the principle for waste retrieval should be taken into consideration)	“The radioactive waste retrievability” is a design principle as stated in Section 1.3.2. of the investment proposal characteristics.
15c	Effectiveness of the identification of the Romanian settlements, number of contaminations and local or state authorities, which should be contacted.	This has been approved as required for the EIA in transboundary context, but the Bulgarian party need input information to be provided by Romania, including also information on the environmental characteristics, which will also be assessed.
16	Which are the Bulgarian institutions bearing responsibility for the final disposal safety, security and financing.	This has been described in Section 1.9. – description of the licensing process and responsibilities of the different institutions for the investment proposal characteristics.
17	Is SE RAW a company solely for RAW management or it has powers on national scale?	This has been described in Section 1.9. – description of the licensing process and responsibilities of the different institutions for the investment proposal characteristics.
18	Is there a financial fund for RAW final disposal and decommissioning? If so, how much time has fund raising taken and what was the share of participation of the Kozloduy NPP operator in this fund?	This has been described in Section 1.9. – description of the licensing process and responsibilities of the different institutions for the investment proposal characteristics. Additional information on the Kozloduy NPP can be retrieved from the National Report on Fulfillment of the Obligation under the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste, which is published at the Bulgarian Nuclear Regulatory Agency website (www.bnra.bas.bg).

No	Proposal of Romania	Answer
19	Characterization of the Radiana site, including as a minimum the following characteristics: geology, hydrology, hydrogeology, geochemistry, tectonics and seismicity, surface processes, meteorology and climate, effects of human activities upon the NDF	This has been included in the ToR for the EIA Report (part 3 – characteristics of the environment, in which the investment proposal shall be implemented and assessment of the effects). More detailed information will be included in the EIA Report.
20	Waste form and content, including radionuclide inventory.	This has been included in the ToR for the EIA Report (part 1.4 of the investment proposal characteristics). More detailed information on the waste form and radionuclide inventory will be included in the EIA Report as stated in Section 1.2.9 of the EIA structure.
21	Operating procedures, decision on NDF closure and institutional control.	This has been included in the ToR for the EIA Report (investment proposal characteristics). More detailed information will be provided in the EIA Report.
22	Monitoring programme.	This has been included in the ToR for the EIA Report (part 1.3 of the investment proposal characteristics). More detailed information will be provided in the EIA Report.
23	The engineering solution/design of the proposed project.	This has been included in the ToR for the EIA Report (investment proposal characteristics). More detailed information will be provided in the EIA Report.
24	The radiation impact analysis, which shall take into consideration the long-lived radionuclides inventory, paths of radionuclides migration into the Danube and the aquifers feeding the territory of Romania, scenarios for normal evolution and alternatives with calculation of the individual doses of the Romanian population.	The radiation impact analysis will be based on the Safety Analysis Report and all the relevant recommendations will be considered.