



MINISTRY OF ENVIRONMENT
AND CLIMATE CHANGE

Cabinet of the Minister

No.: 4683 /A.K./ 10.10.2014

To: **Ministry of Environment and Water**

Subject: Investment project (IP) "Construction of a facility for additional technical water supply of NPP Kozloduy – Cold channel 2"

Dear Ms. Zhekova,

We inform you that we have received both your address no. OBOC-62, dated 25.08.2014 and the notification attached, on paper and electronic format (CD), concerning the project „ *Construction of a facility for additional technical water supply of NPP Kozloduy – Cold channel 2*”.

In response to the notification, we would like to inform you that Romania will participate in the transboundary environmental impact assessment procedure regarding this project.

The notification has been disseminated to the Romanian competent authorities and public. The Romanian authorities have required that the EIA documentation must address the issues attached to the present letter.

I am taking this opportunity to express our readiness to continue our fruitful cooperation and please accept, Ms. Minister, the assurance of my highest consideration and esteem.

Sincerely Yours,

Minister

Attila KORODI

Ms. Svetlana Georgieva ZHEKOVA
Minister of Environment and Water
22 Maria Louiza Blvd.
Sofia, 1000
Republic of Bulgaria

**Annex to the Ministry of Environment
and Climate Change letter no. 4683/AK/10.10.2014**

**“Construction of a facility for additional technical water supply of NPP Kozloduy –
Cold channel 2”**

Considering the content of the Environmental Impact Assessment Report (EIA Report) that the Bulgarian party is required to develop as official document necessary to the analysis and environmental impact assessment processes in a transboundary context, the Romanian authorities consider as important the following aspects that need to be treated with special care:

1. On page 3/6 the document specifies that Bulgaria performs monitoring of the environmental radioactivity for all the main environment components for 100 km around of Kozloduy NPP influence area, but there is no mentioning of the way in which Bulgaria will perform/participate in environment and health monitoring of Romanian territory, located in the influence area of NPP Kozloduy.
2. We kindly request the presentation of environmental and human health risks due to natural disasters (earthquakes, floods, etc.) and terrorist acts during the operation of the cooling channel.
3. We find appropriate that the impact assessment report produced by the cooling channel environment shall be presented as a comparative analysis that takes into account of both data on radioactivity Danube River and its physic-chemical parameters.
4. We request information on the ways that will be used to inform the population of Romania, located in the influence area of 100 km NPP Kozloduy on Romanian territory, the results obtained from environmental monitoring (including radioactivity).
5. We ask for the development and implementation of a common information exchange platform on environmental monitoring data (including radioactivity) in real time, covering bilateral information needs both under emergency and normal situations.
6. Stresses that radioactivity data from permanent monitoring of cooling water channel should be provided (both taking cooling water from the Danube and its reintroduction into the Danube).
7. To define the flows of technical water supply and wastewater discharges in the Danube.
8. The impact of the thermic pollution produced on the Danube River by the new facility for additional technical water supply of NPP Kozloduy – Cold channel 2.
9. Please specify the physico-chemical indicators considered at establishing of the Danube River as a “significantly modified body”.
10. The correlation between the quantity (levies, refunds) and quality (discharged substances, quantity/year) and also the existence of a correlated quantity – quality balance sheet.
11. When you elaborate the technical documents concerning this project, please take into consideration all treaties, protocols, bilateral agreements and European legislative

acts. An important example is the bilateral agreement between Romania and the Republic of Bulgaria which sets forth that the common sector of the Danube River represents a "significantly modified body".

12. Please estimate and justify the negative effects (high taken water flow rate, low Danube flow rate, drought, etc.) with impact on the Danube River after the water flow rate supplied for the cold channel.
13. Please take into consideration the description of design measures to ensure the quality of environmental factors.
14. Which is the relationship between the present project and other existing or planned projects?
15. What are the sensitive areas on the Romanian territory that might be affected by the project implementation?
16. What is the actual used or planned surrounding area of the project?
17. Please provide the hypothesis analysis of an incident or accident that may affect the Danube River and also the prevention, reducing and compensatory measures of negative significant effects on environment.
18. Please describe the prognosis measures for the effects on environment evaluation and also the proposed restoration work for the site at the closure of the additional supply channel or in case of accidents.
19. Please complete the transboundary impact section with the radiologic impact on population health. This study should include an individual and collective human risk estimation taking into account the estimated levels of exposure in all its ways and also the ICRP 103 data's on risk excess for diseases associated with exposure to ionizing radiation (incidence and mortality from malignancies, genetic defects, developmental defects). Those estimations shall cover all worse case scenarios such as the normal developmental situation of all operation and also nuclear incident/accident scenarios.
20. Taking into account the environmental contamination level (air emissions, groundwater, surface water) the environmental impact study should be completed with the impact synergistic effects section on the population of the area of influence, both during construction and for the exploitation.
21. In addition the impact study on inhabitants' health on Romanian territory in the CNE Kozloduy area of influence shall include the cumulated excess risk calculations which the nuclear objectives operating at full capacity in Kozloduy area will produce on human health. We find very important to explore the cumulative effects of cooling water discharges of CNE Kozloduy in the Danube River which add to the cooling water discharges from CNE Cernavoda.
22. Please reconsider the maps sizes at a larger scale as it is impossible for our experts to analyse them.
23. Please reanalyse the cumulative impact, e.g. the impact produced by the additional amount of cooling water discharged (what is the increased intake of hot water when discharged – the flow and temperature of water) and provide also information about the cumulative impact with all cold/warm water channels.
24. The STEREO 70 coordinates are most likely wrong. In the hypothesis that the symbol "÷" is related to the decimal system (" ." in the English system or " , " in the Romanian and/or the Bulgarian system), the STEREO 70 coordinates can't have 7 figures. For example, the Kozloduy city STEREO 70 coordinates are represented as X= 253754.358 m; Y= 396806.318 m.
25. For the geographical coordinates, we mention that they can be used only with high precision error, because they do not specify the datum (e.g. Pulkovo 42 Romania, WGS, etc.).

26. The WGS coordinates are incorrectly expressed. The WGS are expressed in grades, minutes and seconds. Most likely we are dealing with a Cartesian system, related to the centre of the earth, since the Z coordinate related height / altitude is expressed in feet (e.g. we cannot have an altitude of 4388041 m, only if we are dealing with Cartesian's coordinators related to the centre of the earth). Even in this situation we don't know which is the Cartesian system of reference and we are expressing our presumption that this may be ITRF (International Terrestrial Reference Frame).
 27. Please provide the projects STEREO 1970 or WGS coordinates on an electronic support (shape-file or kml/kmz) for that the Romanian authorities may analyse and evaluate this project.
 28. Please take into account the impact of discharge and liquid effluents dilution procedures of CNE Kozloduy based on the implementation of the project.
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