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## **Comments on Lietuvos Energija AB's Environmental Impact Assessment (EIA) Regarding a New Nuclear Power Plant in Lithuania**

These comments are submitted in accordance to the Espoo Convention (<http://www.unece.org/env/eia/eia.htm>) at the request of the Swedish Environmental Protection Agency (<http://www.naturvardsverket.se/>) on 11 September 2008 (registry number 121-5350-07). At that time the deadline for submissions was set as 13 October 2008. The deadline was later on 1 October extended to 22 October.

As was communicated in June 2008 regarding the EIA for the Loviisa 3 nuclear reactor in Finland, it is unacceptable that such a short time be given to review such a large amount of technical information. Once again, none-the-less a number of questions arise. The following issues need to be further addressed or are not addressed at all in the EIS:

- a description of the intended end-use energy consumption for the energy produced together with possible alternative sources for these end-uses, including conservation, efficiency improvements and supply sources;
- a list of isotopes expected to be released to the air and water and their amounts and distribution over time, including maps showing the estimated downwind and downstream plumes;
- a cost analysis addressing the problem of cost over-runs normally experienced by the nuclear industry;
- a broad life-cycle analysis including the entire fuel chain from uranium exploration to spent fuel management and reactor decommissioning, including total CO<sub>2</sub> emissions throughout all phases;
- a detailed description of transport modes and routes, including maps, and accident scenarios for both fresh and spent fuel;
- implications of international spent fuel waste management scenarios, e.g. a central European storage facility, and the current review process in Sweden;

Remarkably, the deficiencies above in Lietuvos Energija AB's EIA were also present in the Loviisa 3 case.

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Information Secretary.