



Opinionsgruppen för säker slutförvaring

Oss - Public Opinion Group for Safe Final Storage of Radioactive Waste

The Oss Association's position with regard to the Swedish Nuclear Fuel and Waste Management Company's (SKB AB) proposal for "The scope, terms of reference, and investigations for environmental impact assessments for an encapsulation plant and a final storage facility for spent fuel. Version 0 – basis for extended* consultation in Forsmark"

For information to:

The Swedish Nuclear Power Inspectorate
The Swedish Radiation Protection Authority
The Swedish National Council for Nuclear Waste
The Uppsala County Administrative Board

The Municipality of Östhammar
The Kalmar County Administrative Board
The Municipality of Oskarshamn
The Municipality of Hultsfred

(This document will also be included in a compilation of material for the Environmental Court in Stockholm).

The local Public Opinion Group for Safe Final Storage of Radioactive Waste (Oss) in the municipality of Östhammar intends to participate in the environmental impact assessment consultation process with the aim of contributing our knowledge and experience, primarily in environmental matters, and in the capacity of representatives of the local public. We are acquainted the Swedish Nuclear Fuel and Waste Management Company's (SKB AB) proposal for the scope of the environmental impact assessment and we participated in the first consultation meeting held in Forsmark on February 5, 2004. In order not to lose an opportunity to influence the content and form of the environmental impact assessment, we have chosen to submit viewpoints in writing which are presented in this document.

In order to make it easier for readers to understand our viewpoints in relation to the scope report, we have organized them according to the headings in the report. This means that the importance we attach to each viewpoint is not apparent in the following summary.

Österbybruk 2004-02-18
Guy Madison, Chairman of the Board, Oss

Summary

Several aspects of the proposed scope report should be developed further, and at the same time the report should be limited to issues that focus primarily on what is required by laws, directives and conventions that regulate environmental assessment procedures.

We would like to point out that it is not logical from a legal perspective to submit a permit application for an encapsulation plant before the choice of method has been approved by the government. According to our understanding, the Swedish Nuclear Fuel and Waste Management Company (SKB AB) should provide an account of the laws that support and the formal decisions that form the basis of their plans for an environmental impact assessment process for an encapsulation plant.

The description of the purpose of the environmental impact assessment process must be broadened and brought into harmony with the intentions of environmental legislation so that the project's potential environmental impacts are more clearly seen as first priority.

There are reasons to demand that extra high standards apply to this environmental impact assessment process and thus it should be in the interest of all parties, including SKB AB's, that the credibility of the material used to make a decision cannot be questioned. It is reasonable to ask that SKB AB expand on their reasoning for taking responsibility for and carrying out

the environmental impact assessment process themselves.

We propose that the description of the requirements for the environmental impact assessment process should be developed so that the connection to the relevant rules and regulations is clarified. As well, a clear definition of the fundamental performance specifications should be included in order to facilitate work with the issues of alternative methods and locations.

The company's description of the Environmental Act's requirement for alternative locations as "if such are possible" is entirely too vague and misleading. We would like to encourage raised ambitions with regard to the siting and environmental impact assessment processes so that they live up to the Environmental Act's section on aims and siting requirements.

In order to facilitate the future evaluation of the report on alternative options, the aim of the site selection process should be more clearly described from the perspective of environmental consequences and environmental laws, which should open the door for previously presented demands from the government and authorities, amongst others, with regard to comparable reports of inland alternatives.

The presentation of the requirements for the environmental impact assessment process must be faultless. It must be clear that the proposed KBS-3 method is not approved and that environmental legislation demands comparable reports on alternatives.

We are of the opinion that SKB AB must develop their line of reasoning about the conditions for reporting on alternatives to include BAT (Best Available Technology).

The concept of "retrievability" should be dealt with in the description of requirements for the examination of options and should be based upon the requirements of environmental legislation.

The zero alternative must be described so that it is clear that it has to do with facilitating a comparative analysis of the zero alternative's possible *longterm environmental impacts*.

The scope report must also include the possibility of siting together with SFL 3-5 (low and intermediate level radioactive waste storage) and SKB AB should specify possible direct and indirect environmental impacts that could arise in the event of this siting option. Alternatively, SKB AB must convincingly show that such a siting option will never be considered.

Scenarios for other development possibilities that include both foreign waste and continued operation of Swedish nuclear power stations should be presented.

Issues that can not be related to "direct and indirect impacts on people and the environment" and which are clarified in the forthcoming RD&D (research, development and demonstration) program, should be removed from the environmental impact assessment process.

SKB AB must provide an explanation for their claim that the KBS-3 method is the best from an environmental perspective and compare this method to other comparably reported upon alternatives.

SKB AB says that they are especially following transmutation and the very deep hole alternative and we propose an equivalent study and comparison of alternative solutions with dry storage as well. The purpose is to fulfill the Environmental Act's requirement for BAT – the Best Available Technology.

In the documentation about an encapsulation plant, there is no description of how the radioactive waste that arises will be handled or stored in the short and long term. The encapsulation plant's connection to and dependence on SFL 3-5 should be described and incorporated into the system analyses and the environmental impact assessment process.

In order to stimulate commitment and interest and not to impede the sharing of information and opportunity to review information, the consultation meetings should be open to the public, organizations and other interested parties.

As a starting point for documentation, it should be the case that all minutes from all meetings should be accessible to all.

* On 1 August 2005, amendments were made to the Environmental Code eliminating the terms "early consultation" and "extended consultation".