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Commissioner Stavros Dimas  
European Commission  
Directorate-General Environment  
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BELGIUM

March 23, 2007

Dear Mr. Dimas,

We, over 160 undersigned organizations from throughout Europe, are deeply concerned about possible EU financial assistance for the construction of the Belene nuclear power plant (NPP) in Northern Bulgaria.

When the catastrophe of Chernobyl took place in 1986, the plans for building two reactors of soviet design in Belene were already in place and construction work on the project began in 1987. However, after the fall of the communist regime, Belene was suspended due to public protests and economic, environmental and safety-related concerns put forward, among others, by the Bulgarian Academy of Sciences in a 421 page detailed critique. In 1997, the Bulgarian Cabinet deemed Belene to be "technically unsound and economically unviable" and terminated the project.

In 2004, the Bulgarian Government inexplicably revived plans for building two reactors at the Belene site and in 2006, it awarded a construction contract to the Russian company "Atomstroyexport", which had put forward a bid in cooperation with the French/German Areva NP. To date, attempts to secure financing from Western banks for Belene have, however, failed. After massive public protests in Germany and Italy, the project was deemed so controversial that Commerzbank, Deutsche Bank, HypoVereinsbank and UniCredit all declined to provide loans for Belene. To our knowledge, the project has also been refused by several U.S., French and Swiss banks.

In this context, we were shocked to hear that the Bulgarian Government now intends to apply for a 300 million Euro loan from the EURATOM facility to launch the construction of the Belene NPP

There are many reasons why non-governmental organizations from throughout Europe are opposed to the financing and completion of the Belene nuclear facility. First and perhaps foremost, is the fact that the power plant will be erected in a region prone to earthquakes. During the last earthquake, some 200 people died only 12 km

from the Belene site in the town of Svishtov. Building a nuclear power plant in close proximity to seismic fault lines is a recipe for disaster. This is one of the key reasons why the Bulgarian Academy of Sciences warned against completing Belene in its 1990 study.

The NPP design proposed for the Belene site is not a known reactor model and there are concerns, whether it will reach current Western safety standards. The planned Russian AES-92 is a customized VVER 1000/V-392 model known under many confusing abbreviations. This reactor type has not been licensed before in Europe or the USA and the licensing procedures of the only country where it is under construction, India, are kept strictly confidential. Although one very similar type was built in China (AES-91, also based on the VVER 1000/320 series), there is no operational experience with this AES reactor since the first unit went into full power operation only in January 2007. There is also no safety assessment available for this reactor. The European Commission should carefully consider whether a EURATOM loan should be granted for an unknown Russian reactor, for which there is little reliable information and no operational experience available.

Even though Atomstroyexport boasts that Belene will be a so called third generation design, it is in fact an upgraded version of the VVER 1000/320 reactor, and would not be granted a construction permit in Germany, as the case of the closed reactor in Stendal shows. Overall, the VVER-1000/320 model is considered to contain specific safety-related deficiencies. This has to do with the height of the containment boundary, the reliability of instrumentation and control systems, the vulnerability of safety systems and an increased tendency towards embrittlement of the reactor pressure vessel. Most recently on March 1, 2006, there was a serious incident at the Kosloduy 5 Reactor in Bulgaria, which is a VVER 1000-320 model. Georgi Kastchiev, former head of the Bulgarian Nuclear Safety Agency, who now works at the University of Vienna, reports that the central safety system of the reactor failed. Authorities first remained silent about this incident and rated it a 0 on the INES scale. Almost two months later they were forced to upgrade it to INES 2 and to confirm Dr. Kastchiev's description of the situation. Dr. Kastchiev himself judged the incident as "driving on a highway without brakes".

There are extensive debates on whether VVER plants can reach a western standard by backfitting, but the simple fact of what happened to the only VVERs that came under the supervision of a Western State illustrate how grave the problems are. After German reunification, the units of Greifswald 6-8 as well as Stendal 1 and 2,, second generation VVERs in varying stages of construction, were scrapped. Both safety and economic considerations were given for these decisions, with safety concerns, however, predominant.<sup>1</sup>

In addition to the seismic risks, the site for Belene is close to the Danube, a river that shows an increasing incidence of heavy flooding. Flooding can have a severe impact upon nuclear power operation. In the case of Belene, flooding could for example

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<sup>1</sup> In the Czech Republic, where the attempt was made to upgrade a VVER-1000 model with the help of Western technology, the results were not at all convincing: the two units at Temelin experienced 102 separate events and many outages in the past six years.

destabilize the underground on which the power station rests. Recent flooding in 2005 and 2006 already affected the communication and transport networks around the plant site. Such effects would jeopardize the implementation of safety related measures by operators and isolate the plant site in a possible emergency, with consequent difficulties in communication and supply. Flooding can also contribute to the dispersion of radioactive material in the event of an accident. On April 14, 2006 the BBC reported: "The Danube reached record-high levels and Bulgarian authorities declared a state of emergency in all 22 communities along the country's 450 km stretch of the river. Vidin, a city of 50,000, is ready for possible evacuation."

The scenario that emerges of an unknown Russian reactor type set in an area that is prone to earthquakes and flooding in a country where nuclear safety concerns are paid little heed<sup>2</sup>, is indeed frightening. All the more so, if one considers that the storage problems for Belene's radioactive waste have not been solved, that no emergency plan exists and that the environmental impact assessment (EIA) does not seriously consider the seismic and flooding risks nor the risk of a major nuclear accident.

In the wider context of Bulgaria's energy policy, we fear that the construction of the Belene NPP would force Bulgaria's investment policy in the energy sector onto an unsustainable path. First of all, it solidifies Bulgaria's dependency on energy resources from Russia (nuclear technology and fuel). Secondly, it diverts investment capital from the least-cost alternative indicated by the EBRD: energy efficiency. According to Eurostat, Bulgaria is by far the least efficient EU member country and requires 10 times as much energy as the EU average to produce 1 Euro of gross domestic product. The 4+ billion Euro investment that is required for Belene is therefore in stark contrast to the 200 Million Euro energy efficiency project that Bulgaria is currently carrying out with finances from the EBRD. Investment for Belene would also divert capital from the development of renewable energy sources. In spite of the huge untapped potential for renewable energy sources in the SEE Region, Bulgaria only has an extremely modest programme in this field - one of the most modest in Europe. In this context, it would be hard to understand, why public European money should now be used to support the nuclear option and its inherent risks for the entire SEE region.

In closing, we would like to add that there is a great deal of opposition to the Belene NPP both in the Belene region, but also across the border in Romania, where municipality leaders representing hundreds of thousands of citizens have declared their opposition to the project, in F.Y.R. of Macedonia, where citizens have charged Bulgaria with violating the Espoo Convention on cross-boundary impacts and in Greece, where a broad coalition of environmental organizations has spoken out against the project.

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<sup>2</sup> Bulgaria had to be pressured heavily by the EU to shut down the first 4 blocks of the Kosloduj nuclear power plant because of their inherent dangers. It would surely have not done so, if this had not been a condition for its accession to the EU. Recent continuous attempts to reopen blocks 3 and 4, show that the Government still does not understand the underlying safety concerns.

In the past few years, the European Commission has time and again articulated its commitment to environmental issues. Supporting a dangerous nuclear power plant that would not be granted a construction permit in countries like Germany or the U.S. and that has not been seen fit for financing by private banks, would call these commitments into question.

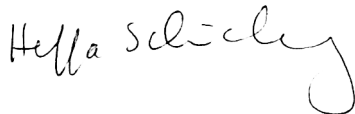
As representatives of civil society from all EU member states, we therefore urgently call upon you to show concern for the safety of European citizens and safeguard the rights of future generations: do not risk a second Chernobyl by financing a nuclear power plant in an earthquake zone, say No to the Belene project! European public money must not be used to back a venture that will endanger the safety of European citizens.

We look forward to your reply and would very much appreciate the opportunity of presenting our concerns to you in a personal meeting.

Sincerely,

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