

HEAD OF THE  
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FOR NUCLEAR AND RADIATION  
SAFETY  
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To the Minister of the Russian Federation  
for nuclear energy  
A.Y.Rumyantsev

31.05.02 № 7-35/518

Dear Alexander Yurevich [Rumyantsev]!

Gosatomnadzor of Russia has analyzed the project proposal "Analysis of the organisation and effectiveness of measures in order to fulfill the current international agreements of the Russian Federation, in the context of the import, storage and reprocessing of spent nuclear fuel (SNF) of foreign nuclear reactors" and the draft for a letter from [Prime Minister] M.M. Kasyanov addressed to [President] V.V. Putin and declares that the presented documents can not be agreed for the following reasons.

In the analysis a wrong conclusion has been made on the existence in the Russian Federation of the necessary administrative and technical possibilities as well as sufficient regulatory basis for the acceptance of spent nuclear fuel (SNF) from foreign nuclear reactors; the profit from the acceptance of SNF is calculated incorrectly and it contains a number of incorrect claims.

In order to ensure the regulatory basis for the acceptance of SNF from abroad it is necessary to in addition to adopt the Joint Convention on the safety of spent fuel management and on the safety of radioactive waste management as well as to work out and to implement in the regular way a number of federal norms and rules, which regulate the safety of the transport, storage and reprocessing of SNF as well as of the management of the products of SNF reprocessing and for the case of an accident during the management of those materials.

For the establishment of the necessary administrative possibilities it is required to decide on the legislative level the question on the regulatory competences in the field of radioactive waste management, including on the economic basis of these competences.

At the RT-1 "Mayak" plant, where currently industrial SNF reprocessing is ongoing, the technical possibilities which could guarantee the appropriate management of radioactive waste in accordance with approved legislative and normative requirements in the field of the use of nuclear energy, radioactive safety for the population and environmental protection are absent. The continuation of liquid radioactive waste dumping into the shallow waters of the water system without the existence of any license from Gosatomnadzor Russia and the absence of the necessary equipment for the processing and vitrification of radioactive waste (the current experiments on the vitrification furnace are unsatisfactory) represent a confirmation of the impossibility of the acceptance of foreign SNF for reprocessing without a general modernisation of the RT-1 plant.

Among the materials of the Analysis no information is given on which share of the regenerated uranium can be re-used and which share would have to be stored, no conclusion has been drawn from the fact, that there is currently no possibility for the reprocessing of SNF from VVER-1000 reactors. Moreover, in the Analysis it should have been noted, that SNF from the nuclear station "A-1" (KS-150) in the CSSR, which has been shipped to the Mayak plant, has still not been reprocessed because of the absence of the technology.

Concerning the safety of transporting SNF it is incorrectly stated, that all transport package containers have been tested and that they completely fulfill the requirements of the IAEA, an incorrect reference to the national rules (PBTRV-73) has been made, the absence of a transport-technological scheme for marine SNF transports has not been noted. For the analysis of the safety of SNF transport it is wrong to exclude from the investigation cases of violation of normative requirements for the transport of SNF from propulsion energy units. In the same way it is unjustified not to take into account for the analysis of the development of SNF reprocessing the radioactive accident at the Siberian chemical combine in 1993.

In the analysis of the economic effectiveness of the import of foreign SNF the costs of the services of the Russian organisations has been calculated incorrectly, because the expenses for the use of the RT-1 plant in accordance with the defined legislative and normative requirements, paid-off payments, obligatory taxes and payments, the price for reprocessing one kilogram SNF has been chosen without justification.

Yu.G.Vishnevskiy