



The appeal of the Belarusian National Platform Eastern Partnership Civil Society Forum to Postpone the Startup of the Belarusian Nuclear Power Plant (NPP) due to the Political Crisis

Minsk

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The presidential election held in Belarus on August 9, 2020, was rigged. It resulted in a political crisis, the president and the government-appointed by him lost their legitimacy.

On August 7, two days before the presidential elections, fuel loading into the dry reactor vessel began. This happened in the absence of a license for operation and before the completion of the appropriate security audit.

On September 7, at the first power unit of the BelNPP, the second stage of start-up work began - hydraulic tests with fuel already loaded into the reactor installation. This happens not only in the absence of a license and before the completion of the safety check, but also with an unclear legal status of these works - on the Gosatomnadzor website there is no official information on the permission or licensing of these physical start-up works.

Thus, there is reason to believe that the launch of the BelNPP is politically motivated and serves as a means for the authorities to demonstrate their political viability.

It poses a serious concern for the Belarusian society. In our opinion, given the current background, it is of paramount importance to postpone the startup.

Our deep concern is the physical start-up of the reactor of the first power unit of the BelNPP in conditions when:

1. Not expert, but political assessments and motives are the basis for this; expert and professional assessments are ignored, and legislation is arbitrarily changed;
2. The launch takes place in a political crisis, which excludes an adequate response to any emergency situation, in particular, an accident with the release of radiation.

1. The politically motivated disregard of expert assessments and changes in legislation in order to facilitate the start-up procedure of the BelNPP is manifested in the following.

1.1. On July 30, shortly before the presidential elections, the legislation regulating the physical start-up of the BelNPP was eased in order to allow the specific stages of the commissioning to be carried out without a license for operation.

Thus the Belarusian NPP commissioning was timed to the elections as a symbolic achievement by president Lukashenko. The change in the procedure enabled accomplishing concrete stages of the reactor start-up before originally required a safety check, public hearings, and an operation license.

1.2. Belarusian powers use to put politically motivated pressure on organizations and supervising bodies. Thus, was a decision in principle about construction in Belarus the first Nuclear Power Plant¹, and the decision on site selection², as well as some consequent decisions related to the construction³.

Political repressions create a situation when any expert opinion that does not correspond to the opinion of the authorities will not be heard. One might recall that a similar situation of suppression of expert opinion by administrative resources preceded the Chernobyl disaster.

¹ The decision in principle about the Belarusian NPP construction, as well as other decisions were made with no public participation, violating UNECE Aarhus Convention (<https://www.unece.org/env/pp/compliance/Compliancecommittee/44TableBelarus.html>)

² The decision on the site selection for the Belarusian NPP was made with violations of the UNECE Espoo Convention

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Also, we state the fact of the arbitrary detention of our colleague on September 6, Irina Sukhy, a search took place in her apartment on the same day. Irina was one of the experts on the Aarhus Convention who oversaw the construction of the BelNPP and criticized the violation.

There are many safety recommendations by ENSREG, given during the stress tests procedure, which was not accomplished yet.

1.3. Government agencies do not provide citizens with reliable information. There are high risks of hiding or misrepresenting information about possible incidents during the commissioning of the Belarusian NPP, which might lead to the lack of adequate measures to protect the population. Under these conditions, it is also impossible to count on the reliability of data proving the readiness of the Belarusian NPP for commissioning.

2. In the event of an accident at the NPP, it would take efforts of multiple specialists to mitigate the consequences. The specificity of the political crisis in the country, in our opinion, excludes an adequate response to any emergency situation. This is manifested in the fact that the forces and resources, which could be used to notify the population about the accident, as well as eliminate its consequences, are concentrated in places of mass protests in order to suppress them. In addition, the current political crisis does not exclude strikes and sabotage actions, which can lead to man-triggered disasters even if the workers of the BelNPP work in normal mode.

At the same time, it is known that during the start-up of the reactor, the risks of accidents increase multiple times compared to the period of normal operation (due burn up failures of equipment and systems, lack of experience of personnel, etc.), and the conduct of such works in a situation of instability amidst a political crisis poses even more danger. Risks associated with the Belarusian NPP are also especially high due to numerous violations during its construction⁴.

Considering all of the above, we believe that the commissioning of the Belarusian NPP is dangerous for the entire global community. This is why we request influential international organizations to put pressure on the Belarusian authorities convincing them to postpone of the physical start-up of the first energy unit of the Belarusian NPP until the following conditions are met:

- Conducting an international, competent, and transparent nuclear power plant safety review followed by addressing all concerns identified and taking due account of all recommendations received as a result of such review.
- Development of an action plan for the protection of the population and the environment in the event of an accident at the nuclear power plant in coordination with neighboring countries.
- Conduct an independent financial and technical audit/inspection involving international institutions/experts, followed by addressing all concerns identified and taking due account of all recommendations received as a result of such audit/inspection.

⁴ The construction of the Belarusian NPP was not transparent and was accompanied by incidents (death of workers, damage to the reactor vessels - one was dropped from a height and replaced with a new one, which, in turn, was hit against a reinforced concrete post during transportation and then installed) and violations (construction of the reactor buildings of the first energy unit began in the absence of a license and approved project documentation; the UNECE Aarhus and Espoo conventions were violated). Defects were not repaired, and violations were not eliminated, recommendations of the ENSREG and bodies of the UNECE Aarhus and Espoo conventions were not accomplished.

