

SWEDISH MUNICIPALITIES WITH
NUCLEAR FACILITIES - KSO

April 23 2019

To IAEA

INPUT ON DRAFT TEC DOC “LEARNING FROM THE EXPERIENCES OF LOCAL STAKEHOLDERS INVOLVED WITH RADIOACTIVE WASTE MANAGEMENT PROGRAMMES”

As coordinator for the five Swedish Municipalities with nuclear facilities, KSO, I have been asked by the association to review the draft TEC DOC dated March 12, 2019. Please find my comments below.

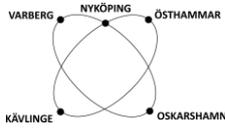
Overview

The present draft TEC DOC gives an extensive overview of the RWM - processes in different countries and underlines the need of a national programme which is accepted on all levels in the society and by different stakeholders. There is no general solution for the RWM implementation so it has to be adapted to special and unique circumstances in each country. The document is also well structured and the conclusions and key general requirements with guideposts for local stakeholder involvement are well defined in the end of the document. Perhaps this chapter should be placed in the beginning of the document instead. This could perhaps contribute to improve the accessibility for the reader of the document.

In that respect learning from others is essential for a successful process. This is valid on all levels in society. Therefore the learning process and possibilities to exchange experiences has to be kept a live even after that the TEC DOC is finally adopted. AS we see it IAEA as an international organization has to take responsibility for learning process in the future. Of course there are other important organization's to as the EU and the OECD and NEA working with different key actors but the IAEA as an independent UN organization has to take actions in this respect and coordinate this to ensure that member states within their national context provide meaningful stakeholder involvement.

To keep up the process, the competence, the interest on local level over an exceptional long time span it's essential to have support and funding from the national level. In Sweden this has been possible for over 20 years but not so much from Government grants but from the Nuclear Waste Fund financed by the industry.

Therefore the Swedish KSO in March 2018 has addressed Parliament, Government and the Regulator and pointed out the importance of that the RWM process and the governmental decision regarding the siting of a final repository in Sweden not is unnecessary delayed. The KSO therefore underline the importance of a political decision on national level.



SWEDISH MUNICIPALITIES WITH NUCLEAR FACILITIES - KSO

April 23 2019

The national level in Sweden

First of all we notice that the document describes the experiences in Sweden, especially on local level, in a much better way than the TEC DOC presented at the stakeholder seminar in Vienna in November 2018. At the seminar we were informed that the Swedish regulatory authority, SSM, had not taken part in the IAEA seminar for regulators. This explains why the Swedish case was not mentioned in the TEC DOC presented in Vienna. We still notice that there is a lack of information from Sweden on a national level in the draft document.

KSO would in this respect like to mention the chapters:

- 3.2.1: Local level relationships with regulatory bodies and implementers

In this chapter we miss specific information from Sweden. As in most countries the regulator has a special role as a neutral source in safety issues and for information to both local authorities and other stakeholders. This is also the case in Sweden.

In Sweden it's up to the regulator, other national authorities and the municipalities to stretch industry especially in connection to the RSD- programme presented by the implementer SKB Co each year.

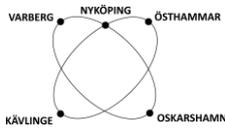
- 3.2.2- - 3.2.5 Interacting with the implementer and regulator etc.

The implementer/industry has a very important role for the local level due to the fact that they are represented in the municipalities by their local organization and the employees very often live in the municipality which is not the case for the regulator. In the Swedish system the industry has a key role and have taken lead in the RWM process for many years. It's also industry who finance (The Nuclear Waste Fund) the local work in the Swedish municipalities taking part in the process for over 20 years and in some cases hosting the facilities in these municipalities.

In the information boxes in these chapters we therefore miss the Swedish example/model were the implementer has had and still have a very significant and important role. This is also the case for the Swedish regulator, The Swedish Radiation Safety Authority. They should therefore contribute with the appropriate information in these chapters.

- 3.5.2.1 Safety comprehensively addressed

One of the chapters points out the fact that a country's track record of safe operations at nuclear facilities will contribute to confidence around RWM safety.



SWEDISH MUNICIPALITIES WITH NUCLEAR FACILITIES - KSO

April 23 2019

KSO cannot underline enough the importance of safe operations of nuclear and RWM facilities and the input it has on local trust. In this respect issues regarding openness and transparency from all parties concerned also are essential which the draft TEC DOC also points out.

KSO therefore miss some information from the Swedish regulator in the information box on page 74. This also applies on chapter's 3.5.2.2 Best international practice and 3.5.2.3 Decision making steps are traceable and understandable and responsive to local input.

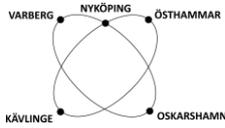
Regarding best international practice KSO would like to mention that the Swedish association for over 40 years has made study trips around the world to receive best international practice from both the regulators, the implementers as well as from the local level and different stakeholders. In the year 2014 KSO also arranged a seminar with the Swedish regulator SSM regarding the Swedish experiences from the Fukushima accident and the stress tests. Sweden and different Swedish authorities in different areas had a significant role in this respect. KSO contributed with the local perspective after a study trip to Japan in November 2013 where the Swedish delegation met local authorities and Mayors in the preparedness zone around the Fukushima facility.

3.5.2.3

In this chapter about traceable and understandable decision making with examples from Canada, Korea and Swizerland KSO would like to add the RSD Programme (Research Safety & Demonstration) carried out by the Swedisch implementer SKB Co every year. The programme is reviewed by both the regulator, other national authorities and the local RWM-organisations in both Östhammar and Oskarshamn Municipalities.

-3.6.1.1 and 3.6.1.2

The chapter 3.6 stresses local interests and enhancing well – being. These are important factors for the local authorities when it comes to recognition from both national government and industry for the municipalities contribution to solve a question of national interest. In Sweden this is exemplified by the so called Added Value Agreement from 2009 between industry and the two Municipalities Östhammar and Oskarshamn. The agreement acknowledge the responsibility the two municipalities have taken for over 20 years to solve an issue of great national importance. The agreement also gives economic opportunities to the municipalities and their local development. This important and unique agreement in both Swedish and international terms is mentioned in the box information on page 82 in the draft.



SWEDISH MUNICIPALITIES WITH NUCLEAR FACILITIES - KSO

April 23 2019

3.7.7 Managing over long time

3.7.7.1

This chapter points out that the RWM process have a duration for many years and that this have impact on the local level when it comes to both uncertainty over time and some frustration when it comes to delayed decision making on national level. This can lead to engagement fatigue and risk of lack of local engagement and skills over the years.

3.7.3 Approaches for managing over long timelines

As mentioned above KSO has already stressed the importance of sustaining financial resources and commitments regarding reliability of community benefits for the future. Therefore it's of utmost importance that the national level take it's responsibility for a decision making process which focus on true engagement. The necessary governmental decisions have to be taken to ensure a decision making process in time so that the process not is prolonged more than necessary. The process has to go on without unnecessary delay. In Sweden the KSO- association has the impression that the decision making process on national level for the siting of the final HLW repository not is in phase with time and there is a risk that the final governmental decision is delayed more than necessary. General elections in Sweden in September 2018 and the process for building a national government also have affected the decision making process and the continuity in this respect.

Experiences on local level in Sweden

As mentioned above local Swedish examples from both Östhammar municipality and the Forsmark NPP on one hand and Oskarshamn Municipality and Oskarshamn NPP on the other is much better described than in the previous TEC DOC with more input from both local authorities concerned in Sweden.

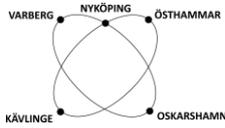
Anyhow KSO have some remarks below.

- 2.2 National level factors providing context for local engagement

2.2.3 Legal requirements

ii. Requirements in national legislation for stakeholder engagement.

In this chapter some countries with requirements for local engagement are mentioned. KSO also think it would be appropriate to mention Sweden and the legislation from 1981 regarding Local Safety or Liaison Committees in Municipalities with nuclear or RW facilities. The Committees are appointed by National Government and the decision makers are local politicians. The Committees also receive annual state grants. The main tasks are: insight into what's going on at the nuclear/RW- facility and to be a neutral source of information to the public.



SWEDISH MUNICIPALITIES WITH
NUCLEAR FACILITIES - KSO

April 23 2019

3.8.3 Decommissioning of nuclear power plants

In the information frame on page 109 in the document Sweden and the Barsebäck NPP is mentioned and you ask for the confirmation on the information given. After contact with the Municipality of Kävlinge where Barsebäck NPP is located I can confirm that the information is correct.

You could also add that the interim storage in Barsebäck was inaugurated in 2017, after a several-year process in which Kävlinge municipality demanded that the building permit should be limited to 20 years. The municipality wants to build housing in this area. But after a judgment in the Land and Environmental Court, the nuclear power plant's owner received a building permit that is valid until further notice.

The implementer SKB Co has decided that the long-lived waste must not be interim stored in SFR in Forsmark and that all such waste should stay at the nuclear power plants until the final repository for long-lived waste, SFL, is built according to plans in 2045. The decision is related to the fact that four Swedish nuclear power plants are decommissioned prematurely, which means that the amount of waste that needs to be interim stored increases. Barsebäck have therefore started investigations on alternatives for interim storage of the long-lived low- and intermediate-level waste. According to SKB Co the interim storage of long-lived low- and intermediate-level waste will take place at the nuclear facilities until SFL is commissioned

Please note that the spelling of the name “Forsmark” in the last line of this chapter is not correct.

ASSOCIATION OF SWEDISH MUNICIPALITIES WITH NUCLEAR FACILITIES

Ted Lindquist
Coordinator