



REPRESENTACION  
PERMANENTE DE  
ESPAÑA ANTE LA  
UNION EUROPEA

Ref. Ares(2019)2768159 - 24/04/2019

EL EMBAJADOR REPRESENTANTE  
PERMANENTE

Sr. Dominique Ristori  
Director General  
DG ENERGÍA  
Comisión Europea

Bruselas 16 de abril de 2019

ASUNTO: Informe conclusiones visita Almaraz - Art. 35 EURATOM

Estimado Director,

En contestación a su escrito de fecha 7 de marzo de 2019 (ref 2019 s-616305) le remitimos los comentarios realizados por nuestras autoridades españolas en relación al proyecto de Informe Técnico de la Comisión Europea sobre la verificación realizada con arreglo al artículo 35 del Tratado EURATOM en la central nuclear de Almaraz y alrededores.

Reciba un cordial saludo,

  
Pablo García-Berdoy

REPR. PERM. ESPAÑA U.E. BRUSELAS SALIDA
Fecha 15 -04- 2019
A24 - 83285

**COMMENTS FROM SPAIN ON THE DRAFT OF TECHNICAL REPORT OF THE EUROPEAN COMMISSION  
ON VERIFICATION UNDER THE TERMS OF ARTICLE 35 OF THE EURATOM TREATY, PERFORMED  
DURING 17-19 JULY 2018 TO ALMARAZ NPP**

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11/04/2019

**General comments to the document “Main Conclusions”:**

In the first draft submitted by the EC to Spain for comments, the following conclusion was included:

*“The Commission services request a report on any significant changes in the set-up of the monitoring systems. Based on this report the Commission will consider the need for a follow-up verification”.*

However, in the new version of the EC report, such conclusion has been modified by specifying a date and making reference in particular to significant changes regarding the Individualized temporary storage facility (ATI).

*“The Commission services request a report on any significant changes in the set-up of the monitoring arrangements before the end of 2020, in particular with regard to the new temporary spent nuclear fuel storage facility (ATI). Based on this report the Commission will consider the need for a follow-up verification”*

Spain wish to express that “a priori” the construction of an ATI does not necessary imply any modification on the Environmental Radiological Surveillance Program.

**Specific comments to the “Technical Report”.** (All the comments listed below have been included in the Technical Report in pdf format):

**1) Page 15: Table 1**

Minor editing mistake

**2) Page 15: Foodnote**

Where it says:

*“Subsequent to the verification visit, in its letter of 1 August 2019 to the CSN, the operator set out a schedule for monitoring of rainwater from the ATI site (itself within the overall site perimeter), via a rainwater collection shaft, to cover the hypothetical failure of the containers”*

Comment:

This document is subsequent to the date of the article 35 verification conducted in Spain and therefore, Spain considers it should not be part of the documents submitted in relation to the verification. Moreover, it is important to clarify that there must be a mistake on the date, as it is not possible the document will be dated on August 2019.

Such footnote is related to the mention provided in the same page about the preoperational surveillance program in the surroundings of the future Individualized Temporary Spent Fuel Storage Facility (ATI)”, as it is said:

*"Additionally, the Almaraz NPP is currently performing a preoperational surveillance program in the surroundings of the future Individualized Temporary Spent Fuel Storage Facility (ATI)".*

However, the referenced document has not any relation with the mentioned program.

### 3) Page 33- Paragraph 8.1.1

Where it says:

*"The verification team visited the emergency dose rate monitor installed inside the plant area"*

Comment:

Spain wishes to clarify that actually there are **four** emergency dose rate monitors inside the plant site. The verification team visited all of them (Edificio H, Caballerizas, Cerro Matraca, Torre Meteorologica). See GPS tracks and photographs attached.



Figure 1: GPS Tracking



Figure 2: Emergency dose rate monitor



Figure 3: Emergency dose rate monitor



Figure 4: Emergency dose rate monitor



Figure 5: Emergency dose rate monitor



Figure 6: Emergency dose rate monitor