



DECISION No. xxx / 2021

The Nuclear Regulatory Authority of the Slovak Republic (hereinafter only as the “ÚJD SR“), as a competent administrative authority pursuant to Sections 5 and 46 of Act No. 71/1967 Coll. on administrative procedure (Code of Administrative Procedure) as amended (hereinafter only as the “Code of Administrative Procedure“), pursuant to Section 4 par. 1 (d) of Act No. 541/2004 Coll. on the peaceful use of nuclear energy (Atomic Act) and on amendments to certain laws as amended (hereinafter referred to as the “Atomic Act“)

Hereby issues

for Slovenské elektrárne, a. s., BIC: 358 29 052, with its registered office at Mlynské Nivy 47, 821 09 Bratislava 2, with place of business: Mochovce Plant, Units 3&4 of Mochovce NPP, 935 39 Mochovce, incorporated in the Commercial Register of the District Court Bratislava 1, reg. number: Sa 2904/B,

- (A) Authorization for the management of radioactive waste and spent nuclear fuel pursuant to Section 5 par. 3 (f) of the Atomic Act within the scope of objects and facilities for the operation of Unit 3, and within the scope of objects and facilities common to Units 3&4 used for operation of Unit 3, including the fresh fuel node, and the management of nuclear materials (fresh nuclear fuel) pursuant to Section 5 par. 3 (g) of the Atomic Act within the scope of objects and facilities for the operation of Unit 3, and within the scope of objects and facilities common to Units 3&4 used to operate Unit 3, excluding fresh fuel node (management of nuclear material in the scope of handling and storage of fresh fuel node in a fresh fuel node, was authorized by ÚJD SR Decision No. 277/2018, which was confirmed by ÚJD SR Decision No. 140/2019 P)**

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- (B) Permit for the commissioning of nuclear installation pursuant to Section 5 par. 3 (b) of the Atomic Act within the scope of objects and facilities for operation of Unit 3, and within the scope of objects and facilities common to Units 3&4 used to operate Unit 3, and approval for the physical start-up pursuant to Section 5 par. 2 (b) of the Atomic Act within the scope of objects and facilities for operation of Unit 3, and in the scope of objects and facilities common to Units 3&4 serving operation of Unit 3,**

and pursuant to Section 121 par. 2 (e) and Section 83 of the Act No. 50/1976 Coll. on Spatial Planning and building regulations (Building Act), as amended (hereinafter referred to as the “Building Act”), assessed the proposal of Slovenské elektrárne, a. s., Units 3&4 Plant of Mochovce NPP, and issues

(C) Permit for early use of the building

Nuclear Power Plant Mochovce WWER 4x440 MW, Project 3

Within the scope of objects and facilities for operation of Unit 3, and within the scope of objects and facilities common to Units 3&4 used for operation of Unit 3,

For the period up to the date of Final Building Approval.

The ÚJD SR, pursuant to Section 5 par. 5 and Section 8 par. 1 (c) of Atomic Act binds the authorization (A) for the management of radioactive waste (hereinafter referred to as “RAW”) and spent nuclear fuel (hereinafter referred to as “SNF”) pursuant to Section 5 par. 3 (f) of the Atomic Act within the scope of objects and facilities for the operation of Unit 3, and within the scope of objects and facilities common to Units 3&4 used for operation of Unit 3, including fresh fuel node, and for the management of nuclear materials (fresh nuclear fuel) pursuant to Section 5 par. 3 (g) of the Atomic Act within the scope of objects and facilities for operation of Unit 3, and within the scope of objects and facilities common to Units 3&4 used for operation of Unit 3, excluding fresh fuel node (management of nuclear material within the scope of handling and storage of fresh nuclear fuel in the fresh fuel node, was permitted by ÚJD SR Decision No. 277/2018, which was confirmed by ÚJD SR Decision No. 140/2019 P) for the following condition, the fulfilment of which shall be ensured within the set deadline by the applicant – Slovenské elektrárne, a. s., for the Units 3&4 Plant of Nuclear Power Plant Mochovce (hereinafter referred to as “MO 3&4“):

- A.1 Obligation to complete tests for systems designed for the management of SNF (tests of container for SNF according to the programs “Program of system tests for storage and handling of SNF“ and “Program equipment test for the preparation of transport container for the collection of spent fuel“), using the equipment (transport container) common to Units 1, 2 and 3. Testing of this equipment can only be carried out after the establishment of the relevant technical and organizational conditions on Unit 3, for which the Public Health Office of the Slovak Republic (hereinafter only as “ÚVZ SR“) issued its binding opinion No. OOPŽ/5413/2020. These technical and organizational conditions will be fulfilled by Slovenské elektrárne, a. s. in accordance with the schedule for preparation of Unit 3 for commissioning within a reasonable time before the first fuel assembly loading into reactor of Unit 3.

Condition A.1 shall be fulfilled by Slovenské elektrárne, a. s. at the latest by the start of commissioning of Unit 3. Slovenské elektrárne, a. s. is required to document the fulfilment of condition A.1 by written evaluation of the progress of the tests and the fulfilment of the success criteria, which shall be submitted to ÚJD SR in the format of an addendum to the document on the readiness of objects and facilities for operation of Unit 3, and objects and facilities common to Units 3&4 used for the operation of Unit 3, confirming the readiness of the said facilities for commissioning of Unit 3 for the stages of physical and energetic start-up according to Annex 1 part C (s) of the Atomic Act, and in compliance with Annex 4 part B (I) (A) par. 5 and 7 of ÚJD SR Decree No. 430/2011 Coll. on the requirements for nuclear safety as amended by Decree No. 103/2016 Coll. (hereinafter only as the “Decree No. 430/2011 Coll. “). Failure to comply with condition A.1 results in the disablement of the nuclear installation for commissioning. The commissioning of a nuclear installation without meeting condition A.1, may be classified as administrative offence under Section 34 par. 2 or Section 34 par. 3 of the Atomic Act.

The ÚJD SR, pursuant to Section 5 par. 5, and Section 8 par. 1 (c) of the Atomic Act binds the permit (B) for the commissioning of a nuclear installation within the range of objects and facilities for operation of Unit 3, and within the range of objects and facilities common to Units 3&4 used for operation of Unit 3 to meet the following conditions, the fulfilment of which will be ensured within the set deadline by the applicant – Slovenské elektrárne, a. s.

B.1 Obligation to complete the tests “Activation and setting of neutron analysers of boric acid solution for Unit 3 of Mochovce NPP“ according to the applicable “Boromer control (calibration) methodology and EXCORE detector test by an external neutron source“ according to the program “Comprehensive EXCORE system test“ Testing of these facilities can only be carried out after creating relevant technical and organizational conditions for Unit 3, on which ÚVZ SR issued its binding opinion No. OOZPŽ/5413/2020. These technical and organizational conditions will be fulfilled by Slovenské elektrárne, a. s. in accordance with schedule for preparation of Unit 3 for commissioning within a reasonable time before loading the first fuel assembly into the reactor of Unit 3, and at the same time obligation to complete the tests according to programs P001 (Program of reactor tests and installation work and of reactor concrete shaft equipment), and 3P004 (Program of handling steel samples from reactor pressure vessel), the completion of which for technological reasons is included in the stage of preparation of reactor for fuel loading and also tests according to 3P142 program (“Primary Circuit Measurement Test Program“), the completion of which is bound to achieve boric acid concentration at shutdown in the primary circuit of Unit 3 before fuel loading into the reactor

And at the same time

The obligation to complete the tests of systems and facilities of the turbine hall and downstream equipment of the secondary circuit according to the list and in accordance with the schedule developed by Slovenské elektrárne, a. s. that is described in more detail in the document “Final report on readiness of Unit 3 and common equipment of MO3&4 for commissioning” The systems and equipment in question are currently in preservation mode, which protects them from corrosion attack, or additional modifications are being made to the system of Unit condensate treatment (hereinafter only as “BÚK“), in order to improve its operational characteristics. Slovenské elektrárne, a. s. will abolish the preservation mode of these facilities within a reasonable time before the first fuel assembly is loaded to the reactor of Unit 3, so as to allow sufficient time to complete the necessary tests and at the same time minimize the exposure time of these facilities to corrosion processes, and at the same time ensure, in accordance with the schedule, completion of BÚK testing and related facilities and systems so that their tests are completed in full as at the start of the energetic start-up of the Unit

And at the same time

Obligation to complete the tests of equipment under the programs of 3P059 “ASFES functional tests program“ in the part system communication with the turbogenerator control system, and 3P146 “Program of chemical monitoring system tests“ after SW tuning.

Condition B.1 shall be fulfilled by Slovenské elektrárne, a. s. at the latest by the start of commissioning of Unit 3 except for the part that is explicitly stated that it must be fulfilled before the beginning of Power start-up tests and that is related to finishing the modification of BUK. Slovenské elektrárne, a. s. is required to document the fulfilment of condition B.1 by written evaluation of the progress of tests and meeting the success criteria, which shall be submitted to ÚJD SR in the format of an addendum to the document on the readiness of objects and facilities for operation of Unit 3, and objects and facilities common to Units 3&4 used to operate Unit 3, confirming the readiness of the said equipment for commissioning of Unit 3 for the stages of physical and energetic start-up according to Annex 1 part C (s) of the Atomic Act, and in accordance with Annex 4 part B (I) (A) par. 5 and par. 7 of the Decree No. 430/2011 Coll. Failure to meet the condition B.1 results in the disablement of the

nuclear installation to start the stage of physical start-up or disablement to start the stage of power start-up (in the part of the condition B.1, where it is explicitly stated that is related to BUK). Initiating the stage of physical start-up without meeting condition B.1 may be classified as administrative offence under Section 34 par. 2 or par. 3 of the Atomic Act.

C.1 The ÚJD SR, pursuant to Section 5 par. 5 of the Atomic Act, Sections 83, 81 par. 1 and 82 par. 2 of the Building Act, binds the issue of permit for early use of the building of Mochovce NPP WWER 4x440 MW Project 3, in the scope of buildings and facilities for operation of Unit 3, and within the scope of buildings and facilities common to Units 3&4 used for operation of Unit 3 to the following condition to ensure safety, fire protection and protection of human health:

- complete the technical modification of the fixed fire-extinguisher, carry-out the prescribed tests of this equipment and provide proof of inspection and functionality test of the fixed fire extinguisher.

Condition C.1 shall be fulfilled by Slovenské elektrárne, a. s. at the latest by the start of commissioning of Unit 3. Slovenské elektrárne, a. s. is required to document the fulfilment of condition C.1 by submitting report on the inspection and testing of the functionality of the fixed fire extinguisher, and removal of the deficiency in question shall be notified in writing to ÚJD SR. Slovenské elektrárne, a. s. is obliged, together with the written notification of removal of the deficiencies in question, to make available the relevant reports on their removal for the needs of the competent Labour Inspectorate, Presidium of the Fire and Rescue Services of the Slovak Republic and ÚJD SR for inspection of their premises in Mochovce. Failure to meet condition C.1 would result in the disablement of the nuclear installation to start the stage of physical start-up. Initiating the stage of physical start-up without meeting condition C.1 may be classified as administrative offence under Section 34 par. 2 or Section 34 par. 3 of the Atomic Act.

Reasoning

The ÚJD SR, based on application of Slovenské elektrárne, a. s. dated 12 December 2016, ref. SE/2016/077759, registered by ÚJD SR under reg. No. 7604/2016 in file No. 3720-2016, initiated administrative proceedings on 12 December 2016 concerning the application of Slovenské elektrárne, a. s. for the issue of:

- permit for the management of RAW and SNF pursuant to Section 5 par. 3 (f) of the Atomic Act within the scope of buildings and facilities for operation of Unit 3, and within the scope of buildings and facilities common to Units 3&4 used to operate Unit 3, including the fresh fuel node (hereinafter referred to as “Administrative Proceedings No. 2.1”),
- permit for the commissioning of nuclear installation pursuant to Section 5 par. 3 (b) of the Atomic Act within the scope of buildings and facilities for operation of Unit 3, and in the scope of buildings and facilities common to Units 3&4 used to operate Unit 3 (hereinafter referred to as “Administrative Proceedings No. 2.2”),
- permit for early use of the building according to Section 83 of the Building Act, and under Section 5 par. 3, (b) of the Atomic Act, and Section 19 par. 3 of the Atomic Act, within the scope of buildings and facilities for operation of Unit 3, and in the scope of buildings and facilities common to Units 3&4 used to operate Unit 3 (hereinafter referred to as “Administrative Proceedings No. 2.3”),

In a letter dated 12 December 2016, ref. SE/2016/077759 Slovenské elektrárne, a. s. requested, in addition to issuing permits in administrative proceedings No. 2.1, 2.2 and 2.3, to issue additional permits:

- permit for the management of nuclear materials in the nuclear installation Nuclear Power Plant Mochovce, WWER 4x440 MW, Project 3, within the scope of handling and storage of

- fresh nuclear fuel in the fresh fuel node, room No. A407 pursuant to Section 5 par. 3 (g) of the Atomic Act (hereinafter referred to as “Administrative Proceedings No. 1.1“),
- permit for the commissioning of nuclear installation within the scope of handling and storage of fresh fuel in the fresh fuel node, room No. A407 pursuant to Section 5 par. 3 (b) of the Atomic Act (hereinafter referred to as “Administrative Proceedings No. 1.2“),
 - permit for an early use of the building in accordance with Section 83 of the Building Act and pursuant to Section 5 par. 3 (b) and Section 19 par. 3 of the Atomic Act, parts of the building in the range of handling and storage of fresh nuclear fuel in the fresh fuel node (hereinafter referred to as “Administrative Proceedings No. 1.3“),
 - permit for the management of RAW and SNF pursuant to Section 5 par. 3, (f) of the Atomic Act within the scope of buildings and facilities for the operation of Unit 4 and in the scope of buildings and facilities common to Units 3&4 used to operate Unit 4 (hereinafter referred to as “Administrative Proceedings No. 3.1“),
 - permit for the commissioning of nuclear installation pursuant to Section 5 par. 3, (b) of the Atomic Act within the scope of buildings and facilities for the operation of Unit 4 and in the scope of buildings and facilities common to Units 3&4 used for the operation of Unit 4 (hereinafter referred to as “Administrative Proceedings No. 3.2“),
 - permit for an early use of the building in accordance with Section 83 of the Building Act, and pursuant to Section 5 par. 3, (b) of the Atomic Act and Section 19 par. 3 of the Atomic Act in the scope of buildings and facilities for the operation of Unit 4, and in the scope of buildings and facilities common to Units 3&4 used for the operation of Unit 4 (hereinafter referred to as “Administrative Proceedings No. 3.3“).

The ÚJD SR informed all parties and other authorities concerned in writing of the opening of the above mentioned administrative proceedings.

The issue of permit in administrative proceedings Nos. 1.1, 1.2, 1.3, 3.1, 3.2 and 3.3 is not the subject of this Decision. Proceedings Nos. 1.1, 1.2 and 1.3 were closed by the issuing of second-instance decisions Nos. 139/2019 P and 140/2019 P of 6 May 2019, which became valid on 22 May 2019.

By letter reg. No. 608/2017 of 31 January 2017, the first-instance administrative authority requested the Chairperson of ÚJD SR as the administrative appellate authority in accordance with Section 58 par. 1 and Section 61 par. 2 of the Code of Administrative Procedure, following Section 49 par. 2 of the Code of Administrative Procedure, for an extension of the time limit for a decision in administrative proceedings Nos. 1.1, 1.2, 1.3, 2.1, 2.2, 2.3, 3.1, 3.1 and 3.3, by 6 months. The first-instance administrative authority justified its request by a large scope of documentation to be assessed, and also by the large number of conformity checks to be carried out in order to confirm conformity of the actual workmanship of the equipment with the design, in order to fully comply with Section 46 of the Code of Administrative Procedure, which provides that the decision must be based on a reliably established state of affairs. The Chairperson of ÚJD SR complied with the request of the first instance administrative authority and extended the period for the decision by 6 months. The parties and other authorities concerned were informed of the extension of the time limit for the decision by ÚJD SR letters reg. No. 623/2017 of 1 February 2017, reg. No. 778/2017, 779/2017 and 780/2017 of 7 February 2017.

Documentation of administrative proceedings Nos. 2.1, 2.2 and 2.3 and other administrative proceedings related to the application of Slovenské elektrárne, a. s. to issue a permit for the commissioning of a nuclear installation (Administrative Proceedings Nos. 1.1, 1.2, 1.3, 3.1, 3.2 and 3.3) with sensitive information removed, as defined in Section 3 par. 16 and 17 of the Atomic Act, and in accordance with Section 8 par. 3 of the Atomic Act, was disclosed by ÚJD SR from 16 March 2017 until 30 June 2017 in rented premises in Mochovce.

After assessing the submitted documentation, ÚJD SR concluded that Slovenské elektrárne, a. s. has to complete its submission and interrupted the administrative proceedings Nos. 1.1, 1.2, 1.3, 2.1, 2.2, 2.3, 3.1, 3.2 and 3.3 by ÚJD SR Decision No. 334/2017 of 23 August 2017. At the same time called Slovenské elektrárne, a. s., pursuant to Section 19 par. 3 of the Code of Administrative Procedure, to remedy those deficiencies of the submissions identified in ÚJD SR Decision No. 334/2017.

The deficiencies of submission in administrative proceedings No. 2.1 were set out in Annex 1 to the letter of ÚJD SR reg. No. 5263/2017 of 22 August 2017 concerning the documentation for the administrative proceedings submitted (Document on ensuring RAW management, including its financial coverage, RAW and SNF Management Plan, Pre-Operational Safety Report of MO3&4 (hereinafter referred to as “PSR of MO3&4”), Certificates and mandates of Slovenské elektrárne, a. s. for the performance of work activities for professionally qualified staff). By Decision No. 334/2017 on the stay of administrative proceedings, ÚJD SR set as a condition for the continuation in the administrative proceedings No. 2.1, to remedy the deficiencies in the given documentation no later than 15 February 2018. The deficiencies of submission in administrative proceedings No 2.2 were set out in Annex 2 to the letter of ÚJD SR reg. No. 5263/2017 of 22 August 2017 concerning the documentation for the administrative proceedings (Testing Programs for safety-related equipment determined by ÚJD SR, Commissioning Programs, Operating Procedures designated by ÚJD SR, PSR of MO3&4 and Probabilistic Safety Assessment – PSA). By Decision No. 334/2017 of 23 August 2017 on the stay of administrative proceedings, ÚJD SR provided as a condition for the continuation of administrative proceedings No. 2.2 to remedy deficiencies in the given documentation by 15 February 2018, and at the same time to remedy the deficiencies in the documentation of the administrative proceedings No. 2.1, also by 15 February 2018.

At the same time, by Decision No. 334/2017 of 23 August 2017, the ÚJD SR called Slovenské elektrárne, a. s. to complement the submission in the administrative proceedings No. 2.1 by protocols on successful testing of equipment for the management of RAW and SNF for Unit 3 operation, and within the scope of facilities common to Units 3&4, and used for operation of Unit 3, including the fresh fuel node, and a schedule for further tests of these facilities to be carried out before the start of commissioning of Unit 3. These protocols and schedule were requested by ÚJD SR to be submitted according to the current state of the tests as of the same date as the requested evaluation of testing Unit 3 equipment, or preliminary proof of readiness of systems and equipment of Unit 3 for commissioning (in administrative proceedings No. 2.2), at the latest by 12 months from the date of ÚJD SR Decision No. 334/2017.

ÚJD SR also called Slovenské elektrárne, a. s. to supplement the submission in administrative proceedings No. 2.2 with the following particulars:

- 1) evaluation of tests of Unit 3 systems and equipment or preliminary proof of readiness of Unit 3 systems and equipment for commissioning, confirming a high degree of its readiness for the start of stage part of inactive testing for Unit 3 (cold hydrotest of the primary circuit of Unit 3). ÚJD SR requirements for evaluation or submission of a preliminary proof on the readiness of Unit 3 systems and equipment were set out in Annex 3 to the ÚJD SR letter ref. 5263/2017 of 22 August 2017.
- 2) documents confirming compliance with the qualification requirement of staff of Slovenské elektrárne, a. s. for carrying out activities with direct impact on nuclear safety (selected staff of Slovenské elektrárne, a. s.) and with impact on nuclear safety (professionally qualified staff of Slovenské elektrárne, a. s.) for commissioning of Unit 3. The requirements of ÚJD SR to confirm compliance with the qualification requirements of staff of Slovenské elektrárne, a. s. were set out in Annex 3 of the letter of ÚJD SR ref. 5263/2017 of 22 July 2017.

ÚJD SR called Slovenské elektrárne, a. s. to complete the submission under points 1) and 2) no later than 12 months from the date of the decision on suspending administrative proceedings. The ÚJD SR specified in its Decision No. 334/2017 of 23 August 2017, as a condition for continuation of

administrative proceedings No. 2.2, to also remedy the deficiencies in the documentation of the administrative proceedings No. 2.1 with the deadline of 15 February 2018. Deficiencies of submission in administrative proceedings Nos. 1.1, 1.2, 1.3, 2.1, 2.2, 2.3, 3.1, 3.2 and 3.3 were published on the website of ÚJD SR.

Slovenské elektrárne, a. s. continuously submitted documentation to ÚJD SR with remedied deficiencies. ÚJD SR continuously evaluated the elimination of deficiencies in the documentation. The removal of deficiencies in the documentation of administrative proceedings No. 2.1 and 2.2 has been confirmed in writing, as follows:

- In the document on ensuring RAW management, including its financial coverage by letter reg. No. 395/2018 of 22 January 2018,
- In the RAW and SNF management plan by letter reg. No. 766/2018 of 7 February 2018,
- in PSR MO3&4 by letter reg. No. 768/2018 of 13 February 2018,
- in the certificates and mandates of Slovenské elektrárne, a. s. for the performance of work activities for professionally qualified staff by letters reg. No. 100/2018 of 8 January 2018 and 396/2018 of 22 January 2018,
- in the programs of testing safety related equipment designated by ÚJD SR in letter reg. No. 767/2018 of 8 February 2018,
- in the commissioning programs, by letter reg. No. 769/2018 of 13 February 2018,
- in the operating procedures designated by ÚJD SR in letter reg. No. 771/2018 of 13 February 2018,
- in the Probabilistic Safety Assessment – PSA by letter reg. No. 896/2018 of 14 February 2018,
- in proof of ownership and organizational structure by letter reg. No. 396/2018 of 22 January 2018.

By the above mentioned letters, ÚJD SR confirmed that the deficiencies in the documentation of Slovenské elektrárne, a. s. in compliance with the requirement contained in the Decision to suspend administrative proceedings, were eliminated duly and on time (i. e. before 15 February 2018).

On 28 August 2018, Slovenské elektrárne, a. s. supplemented its submission concerning the application for permits pursuant to the operative part of the draft decision (administrative proceedings Nos. 2.1 and 2.2) and also in the administrative proceedings for Unit 4 (administrative proceedings Nos. 3.1 and 3.2). ÚJD SR carried out a preliminary evaluation of complemented submission in administrative proceedings Nos. 2.1, 2.2, 3.1 and 3.2, based on which ÚJD SR stated that Slovenské elektrárne, a. s. by complementing missing elements in submission of 28 August 2018, fulfilled all the conditions specified by ÚJD SR Decision No. 334/2017 of 23 August 2017 for the continuation of the proceedings in question.

Consequently, ÚJD SR by letters reg. Nos. 5913/2018, 5918/2018, 5021/2018 of 19 September 2018, and 6048/2018 of 26 September 2018, notified all parties in writing that the administrative proceedings Nos. 2.1, 2.2, 3.1 and 3.2 continue from 28 August 2018. At the same time, by these letters ÚJD SR informed the parties that the documentation for the decision in administrative proceedings Nos. 2.1, 2.2, 3.1 and 3.2 will be published on the website of ÚJD SR as a “basis for the decision on Units 3&4” no later than 28 September 2018, and invited them to comment in writing on the documentation forming the basis for the decision no later than 28 October 2018. The ÚJD SR published the documentation for the decision on its website in accordance with the specified deadline. In the supporting documentation for the decision published on the website of ÚJD SR, the method of remedying the deficiencies in the documentation and the follow-up to the recommended conditions of the Ministry of Environment of the Slovak Republic (hereinafter only as “MoEnv SR”) mentioned in the Final Opinion (No. 395/2010-3.4/hp) of 28 April 2010 issued by MoEnv SR (hereinafter referred to as the “Final Opinion on EIA MO3&4”) pursuant to Act No. 24/2006 Coll. on environmental impact assessment and on amendments to certain laws as amended (hereinafter as “Act No. 24/2006 Coll.”) was published.

Following the addition to the submission, the ÚJD SR assessed the documentation of administrative proceedings Nos. 2.1 and 2.2 in the following scope:

- 1) Identification data pursuant to Section 6 par. 1 (b) of the Atomic Act.
 - Slovenské elektrárne, a. s.–submitted the relevant identification data required by Section 6 par. 1 (b) of the Atomic Act in a submission of 12 December 2016. In the supplemented submission of 22 June 2018 Slovenské elektrárne, a. s. confirmed that the above data remain unchanged compared to the data submitted on 12 December 2016. On an extract from the Register of Legal Entities, Entrepreneurs and Public Authorities was requested under Act No. 177/2018 Coll. on certain measures to reduce administrative burden through the use of public administration information systems and on amendments to certain laws (Act against red-tape), as amended by Act No. 221/2019 Coll. (hereinafter only as the “Act No. 177/2018 Coll.”), which verified the accuracy of the data in question.
- 2) Description of activity, for which permit is sought pursuant to Section 6 par. 1 (c) of the Atomic Act.
 - Slovenské elektrárne, a. s. clearly defined the activities, for which it applied for permits. These include the permit for the management of RAW and SNF pursuant to Section 5 par. 3 (f) of the Atomic Act in the scope of buildings and facilities for the operation of Unit 3 and in the scope of buildings and facilities common to Units 3&4 used for operation of Unit 3, including the fresh fuel node, the permit for the commissioning of nuclear installation pursuant to Section 5 par. 3 (b) of the Atomic Act in the scope of buildings and facilities to operate Unit 3, and in the scope of buildings and facilities common to Units 3&4 used for operation of Unit 3, and the permit for an early use of the building pursuant to Section 83 of the Building Act and pursuant to Section 5 par. 3 (b) of the Atomic Act, and Section 19 par. 3 of the Atomic Act in the scope of buildings and facilities for operation of Unit 3, and in the scope of buildings and facilities common to Units 3&4 used for operation of Unit 3. These activities were defined by Slovenské elektrárne, a. s. in its submission dated 12 December 2016.
- 3) Data necessary to request an extract from the criminal record of a natural person, a legal entity and a person, who is a statutory body or member of a statutory body of a legal entity pursuant to Section 6 par. 2 (a) of the Atomic Act.
 - Slovenské elektrárne, a. s. submitted extracts from the Criminal Record of the General Prosecutor’s Office of SR of all members of the statutory body of the company, and an extract from the criminal record of the legal entity, Slovenské elektrárne, a. s. on 12 December 2016. All listings were without record. Updated extracts were submitted also in the supplemented submission of 22 June 2018. On an extract from the criminal record was requested for the legal entity – Slovenské elektrárne, a. s. and all members of the company’s statutory body pursuant to Act No. 177/2018 Coll.
- 4) Extract from the Commercial Register of companies pursuant to Section 6 par. 2 (b) of the Atomic Act by 31 August 2018.
 - Slovenské elektrárne, a. s. submitted an extract from the Commercial Register of the District Court Bratislava I as of 17 May 2018. On an extract from the Register of Legal Persons, Entrepreneurs and Public Authorities was requested pursuant to Act No. 177/2018 Coll., which verified the accuracy of the data in question.
- 5) Proof of functional technical equipment of Slovenské elektrárne, a. s., for the required activity according to Section 6 par. 2 (e) of the Atomic Act.
 - Slovenské elektrárne, a. s. submitted to ÚJD SR documents confirming readiness for the management of RAW, SNF and nuclear materials and for commissioning of Unit 3. The results of the previous testing of systems and equipment needed for the management of RAW, SNF and nuclear materials, and for commissioning of Unit 3, are summarized in the document Final Report on the readiness of Unit 3 and of common facilities of MO3&4 for commissioning (hereinafter only as the “Final Report on Unit 3”). This document demonstrates compliance with the requirements of Annex 4 part B (I) (A) par. 5, 7 and 9 of the Decree No. 430/2011 Coll. including proof of staff readiness. The Final Report for Unit 3 was submitted by Slovenské elektrárne, a. s. to the ÚJD SR inspectors at its premises

in Mochovce for inspection purposes. Inspectors of ÚJD SR carried out an evaluation of the Final Report of Unit 3 during their inspection in Mochovce. The outcome of the evaluation is that the Final Report of Unit 3 demonstrates the readiness of systems and facilities for the management of RAW, SNF and nuclear materials and for commissioning of Unit 3. Part of the tests to be carried out before commissioning of the Unit, will be carried out in accordance with the technical or organizational conditions for its implementation at a later date, but before loading the first fuel assembly into the reactor of Unit 3. ÚJD SR reflected this fact into the conditions of the decision (Conditions A.1 and B.1), including the relevant explanation /reasoning.

- 6) Proof that the applicant – Slovenské elektrárne, a. s., has permanent staff with the required qualification according to Section 6 par. 2 (e) of the Atomic Act, and proof of the number of permanent staff together with their qualification pursuant to Section 6 par. 2 (i) of the Atomic Act.
- Slovenské elektrárne, a. s. submitted part of the requested documents in the supplement of the submission from 28 August 2018. This documentation was not complete, as the training of specially qualified staff and professionally qualified staff was ongoing by that date. In November and December 2019 as well as in December 2020, ÚJD SR carried out inspection at Slovenské elektrárne, a. s. in MO3&4, focusing on staffing job positions having impact on nuclear safety in the departments of future operation, asset management and engineering support of future operation of Unit 3. During this inspection, Slovenské elektrárne, a. s. submitted documents proving the following:
 - All job positions of specially qualified staff under Section 24 par. 2 of the Atomic Act, who are necessary for the operation of Unit 3, are staffed by employees with completed training. These staff members have valid certificates of special professional competence pursuant to Section 8 of ÚJD SR Decree No. 52/2006 Coll. on professional competence as amended (hereinafter only as “Decree No. 52/2006 Coll.“), and authorization for performance of work activities pursuant to Section 10 of the Decree No. 52/2006.
The job positions of professionally qualified staff pursuant to Section 24 par. 1 of the Atomic Act in the departments of future operation, asset management and engineering support of the future operation of Slovenské elektrárne, a. s. for MO3&4, are staffed by employees to the extent necessary for operation of Unit 3. The number of vacancies does not exceed the normal values of turnover and filling of these posts is addressed by Slovenské elektrárne, a. s. on a continuous basis. These staff members have completed their training and have authorization for performance of work activities pursuant to Section 10 of the Decree No. 52/2006.
Slovenské elektrárne, a. s. proved the readiness of staff for the management of RAW, SNF and nuclear materials, and for commissioning of Unit 3 in the Final Report on Unit 3. In August 2020, the ÚJD SR inspectors carried out inspection that confirmed the readiness of the staff for the management of RAW, nuclear materials, SNF and commissioning of Unit 3.
- 7) Proof of ensuring RAW management, including its financial coverage pursuant to Section 6 par. 2 (f) of the Atomic Act.
- Slovenské elektrárne, a. s. submitted a document on the provision of RAW management, including its financial coverage in the submission dated 12 December 2016. ÚJD SR requested complementing certain data (listed in the list of deficiencies of submission in Annex 1 to letter reg. No. 5263/2017). Subsequently, Slovenské elektrárne, a. s. supplemented the required data by letter No. SE/2017/065026 dated 13 November 2017. ÚJD SR carried out inspection No. 230/2017, which resulted in confirmation of the completeness and correctness of the completed data. ÚJD SR confirmed the removal of the deficiencies of the submission by letter reg. No. 395/2018 of 22 January 2018.
- 8) Proof of ownership and organizational structure of the applicant – Slovenské elektrárne, a. s. pursuant to Section 6 par. 2 (g) of the Atomic Act.
- Slovenské elektrárne, a. s. submitted extract from the Commercial Register of the District Court Bratislava I of 17 May 2018 and organizational structure and systemization of MO3&4 and Unit B4000 by letter ref. SE/2017/062611 dated 2 November 2017. On an

- extract from the Register of Legal Entities, Entrepreneurs and Public Authorities was requested pursuant to Act No. 177/2018 Coll.
- Systemization of MO3&4 and Unit B4000 was checked by ÚJD SR inspection held in November – December 2019. Part of the inspection was submitting systemization in the departments of future operation, asset management and engineering support of future operation for Unit 3.
- 9) Documentation required for the application for commissioning pursuant to Section 6 par. 2 (h) of the Atomic Act, Annex 1 part C:
- a) Limits and Conditions for safe operation – approved by ÚJD SR Decision No. 88/2018 of 24 April 2018. Changes in the operating procedure: Limits and Conditions, related to the incorporation of a permit for the release of radioactive materials, arising from the operation of Units 1, 2 and 3 of the Nuclear Power Plants Mochovce from administrative control by discharging them into the environment (No. OOZPŽ/4603/2019 of 15 October 2019) and minor editing of the text, approved by ÚJD SR by Decision 205/2020 of 17 July 2020.
 - b) List of safety-related equipment divided into safety classes – approved by ÚJD SR Decision No. 495/2016 of 19 September 2016. At this stage, ÚJD SR agrees to the submitted document and expects it to be updated after the commissioning of Unit 3 has been completed.
 - c) Programs of testing of safety-related equipment determined by ÚJD SR – testing programs for safety-related equipment determined by ÚJD SR were submitted by Slovenské elektrárne, a. s. for Unit 3 as part of the submission of 12 December 2016. ÚJD SR made comments on the programs in question, which it classified as deficiencies of the submission. For the removal of these deficiencies it determined a deadline by Decision No. 334/2017 of 23 August 2017 to suspend administrative proceedings, by no later than 15 February 2018. Slovenské elektrárne, a. s. continuously submitted documentation to the ÚJD SR with remedied deficiencies. ÚJD SR confirmed the removal of deficiencies in the submission by letter reg. No. 767/2018 dated 8 February 2018. Slovenské elektrárne, a. s. submitted to ÚJD SR programs for the testing of safety-related equipment determined by ÚJD SR for Unit 4 with incorporated comments of ÚJD SR on analogous programs for Unit 3. ÚJD SR accepted submission of these programs by letter reg. No. 765/2018 of 7 February 2018.
 - d) Program of commissioning of a nuclear installation broken down into stages – The Program of Commissioning of Nuclear Installation broken down into stages, was submitted by Slovenské elektrárne, a. s. for Unit 3 as part of the submission of 12 December 2016. ÚJD SR had comments on the program and related physical and energy start-up programs, which it classified as deficiencies of submission and set a deadline to remedy the deficiencies of the submission by Decision No. 334/2017 of 23 August 2017 to suspend administrative proceedings by 15 February 2018 at the latest. Slovenské elektrárne, a. s. submitted gradually to the ÚJD SR documentation with remedied deficiencies. ÚJD SR confirmed removal of deficiencies of submission by letter reg. No. 769/2018 of 13 February 2018. Slovenské elektrárne, a. s. submitted to the ÚJD SR a commissioning program broken down to stages for Unit 4 with incorporated comments on analogous program for Unit 3. ÚJD SR accepted submission of these programs by letter reg. No. 765/2018 of 7 February 2018. Slovenské elektrárne, a. s. submitted a new revision of the document - by letter ref. SE/2019/050644 dated 18 September 2019, Program for Commissioning Unit 3 broken down into stages (rev. 04). Compared to the previous revision of the document in question, revision 04 includes pre-operational tests for the energy start-up stage of Unit 3. ÚJD SR assessed the document and stated compliance with the requirements of Annex 4 part B (I) (A) (8) and G (1) of the Decree No. 430/2011 and Section 15 of the ÚJD SR Decree No. 58/2006, laying down the details of the scope, content and method of drawing up the documentation of nuclear installations necessary for individual decisions, as amended (hereinafter only as “Decree No. 58/2006“). ÚJD SR approved the above- mentioned change to the program of commissioning the nuclear installation MO3&4 by a separate Decision No. 478/2019 of 18 December 2019. By letter ref. SE/2019/067197 of 6 December 2019 Slovenské elektrárne, a. s. submitted to ÚJD SR changes in individual programs of physical and energy start-up of Unit 3. These changes resulted from the evaluation of the course of inactive tests of

- equipment and systems that are needed at the stage of commissioning of Unit 3. ÚJD SR reviewed the changes in the programs of physical and energy start-up and found deficiencies in them. By letter reg. No. 1915/2020 of 12 March 2020, ÚJD SR requested Slovenské elektrárne, a. s. to remedy those deficiencies. Slovenské elektrárne, a. s. sent a letter ref. SE/2020/029357 of 04 June 2020 with programs of physical and energy start-up without deficiencies identified by ÚJD SR. ÚJD SR reviewed remedied programs of physical and energy start-up, based on which it stated compliance with the requirements of Annex 4 part B (I) (A) par. 8 and G par. 1 of the Decree No. 430/2011 and Section 15 of the Decree No. 58/2006. ÚJD SR confirmed this fact in letter reg. No. 5772/2020 of 21 August 2020 sent to Slovenské elektrárne, a. s. Slovenské elektrárne, a. s. submitted by letter ref. SE/2020/061995 dated 10 December 2020 to ÚJD SR new revision of the program 3F002 "Reactor core loading program of NPP Mochovce Unit 3". ÚJD SR evaluated the new revision of the program 3F002 and based on this evaluation it states that changes in the program are in compliance with Annex 4 Part B (I) (A) (8) and G (1) of the Decree No. 430/2011 and Section 15 of the ÚJD SR Decree No. 58/2006. ÚJD SR confirmed this by the letter ref. 153/2020 dated 14 January 2021 that was sent to Slovenské elektrárne, a. s.
- e) Program of operational inspections of safety-related equipment – ÚJD SR approved the program of operational inspections by its Decision No. 264/2020 of 22 September 2020.
 - f) Documentation of the applicant's quality management system – approved by ÚJD SR Decision No. 57/2019 of 27 February 2019 (Management System Manual of SE, a. s.) and No. 208/2019 of 8 July 2019 (Staged quality assurance program of MO3&4 for the construction and commissioning).
 - g) The operating procedures identified by ÚJD SR – submitted by Slovenské elektrárne, a. s. for Units 3&4 as part of the submission dated 12 December 2016. ÚJD SR had comments on these procedures, which it classified as deficiencies of the filing. In order to remedy the deficiencies of the submission, it determined a deadline by its Decision No. 334/2017 to suspend administrative proceedings, by 15 February 2018 at the latest. Slovenské elektrárne, a. s. gradually submitted documentation to ÚJD SR with removed deficiencies. ÚJD SR confirmed removal of deficiencies of the submission by letter reg. No. 771/2018 of 13 February 2018. The operating procedures specified by ÚJD SR, after deficiencies remedied, are in compliance with Section 18 of the Decree No. 58/2006. Slovenské elektrárne, a. s. submitted to ÚJD SR by the letter ref. SE/2020/061697 dated 9 December 2020 new revision of operating procedures "Neutron-Physics Core Parameters of Unit 3, 1st Fuel Load" (1st edition, revision 6) and procedure "Nuclear Safety Rules for Fuel Handling" (1st edition, revision 3). ÚJD SR evaluated changes in the above stated programs, based on what it states that changes in the programs are in compliance with Annex 4 Part B (I) (A) (8) and G (1) of the Decree No. 430/2011 and Section 15 of the ÚJD SR Decree No. 58/2006. ÚJD SR confirmed this by the letter ref. 153/2020 dated 14 January 2021 that was sent to Slovenské elektrárne, a. s.
 - h) On-site Emergency Plan – approved by ÚJD SR Decision No. 16/2020 of 14 January 2020. The On-site Emergency Plan shall enter into force on the date of final permit for the commissioning of nuclear installation MO 3&4. Until the start of commissioning of MO3&4, the Preliminary On-site Emergency Plan, approved by ÚJD SR Decision No. 401/2019 of 12 November 2019, is in force.
 - i) PSR of MO3&4 – was submitted by Slovenské elektrárne, a. s. as part of the submission of 12 December 2016. ÚJD SR had comments on PSR of MO3&4, which it classified as deficiencies of the submission and determined the deadline for remedying those deficiencies by its Decision No. 334/2017 of 23 August 2017 to suspend the administrative proceedings, as 15 February 2018 at the latest. Slovenské elektrárne, a. s. submitted the PSR of MO3&4 documentation to ÚJD SR with removed deficiencies by letter ref. SE/2017/065735 of 15 November 2017. ÚJD SR confirmed removal of deficiencies in the submission by letter reg. No. 768/2018 of 13 February 2018. Slovenské elektrárne, a. s. submitted to ÚJD SR with a letter ref. SE/2019/059184 of 30 October 2019, the new revision of some documents, which are part of the PSR of MO3&4. ÚJD SR reviewed the changes in the latest revision of PSR of

MO3&4 compared to the revision of the document in question, which was submitted to ÚJD SR by letter No. SE/2017/065735 of 15 November 2017. Changes made to the PSR of MO3&4 meet the conditions required by Section 19 of the Decree No. 58/2006, and the addition to the submission meets the requirements of Section 9 par. 3 of the ÚJD SR Decree No. 431/2011 on the Quality Management System, as amended by the Decree No. 104/2016 (hereinafter only as the “Decree No. 431/2011”). The reason for the changes in PSR of MO3&4 is the incorporation of the results of inactive tests into the PSR of MO3&4. ÚJD SR confirmed this fact to Slovenské elektrárne, a. s., by letter reg. No.7140/2020 of 30 October 2020.

- j) Probabilistic safety assessment of operation for nuclear installations with a nuclear reactor for the shutdown reactor and for low power levels, as well as for full power of the reactor (hereinafter only as “PSA“) – was submitted by Slovenské elektrárne a. s. as part of the submission of 12 December 2016. ÚJD SR had comments on the PSA, which it classified as deficiencies of the submission. For the removal of deficiencies it specified a deadline by ÚJD SR Decision No. 334/2017 of 23 August 2017 to suspend administrative proceedings. Slovenské elektrárne, a. s. gradually submitted documentation to ÚJD SR with removed deficiencies and ÚJD SR confirmed partial elimination of deficiencies in the submission by letter reg. No. 896/2018 of 14 February 2018. ÚJD SR requested the addition to a probabilistic safety assessment of extreme climatic conditions and earthquakes. Slovenské elektrárne, a. s. submitted to ÚJD SR the requested extension of PSA by letter ref. SE/2019/062019 of 12 November 2019. ÚJD SR reviewed submitted supporting documentation, based on which it stated their compliance with the requirements of Section 20 of the Decree No. 58/2006 and safety guides of ÚJD SR, Requirements for the development of a PSA (BNS I.4.2/2017).
- k) Physical Protection Plan, including a contract with the Police Force pursuant to Section 26 par. 10 of the Atomic Act. ÚJD SR Decision No. 154/2018 of 24 May 2018 approved the document “Physical Protection Plan of MO3&4 UČP/fresh fuel node“, 1st edition, revision 0. ÚJD SR Decision No. 280/2018 of 10 October 2018 approved a change in the document “Physical Protection Plan of MO3&4 UČP“, 1st edition, revision 0, within the scope of the document sent “Physical Protection Plan of MO3&4 UČP“, 1st edition, revision 1. ÚJD SR Decision No. 134/2019 of 13 May 2019 approved change in the document “Physical Protection Plan of MO3&4 UČP“, 1st edition, revision 0, and a change approved by ÚJD SR within the scope of the document sent “Physical Protection Plan of MO3&4 UČP“, 1st edition, revision 2. ÚJD SR Decision No. 39/2020 of 30 January 2020 approved a change in the physical protection plan of MO3&4 UČP within the scope of the document “Physical Protection Plan of MO3&4 UČP“, 1st edition, revision 3. ÚJD SR decision no. 328/2020 of 2 December 2020 approved changes in physical protection plan for MO3&4 UČP in the extend of the submitted document “Physical Protection Plan for MO3&4 UČP” 1st edition, revision 4. ÚJD SR Decision No. 260/2018 of 14 September 2018 approved the “Physical Protection Plan of SE-MO3&4“, 1st edition, revision 0. ÚJD SR Decision No. 281/2018 of 10 October 2018 approved a change to the document “Physical Protection Plan of SE-MO3&4“, 1st edition, revision 0, within the scope of the document sent “Physical Protection Plan of SE-MO3&4“, 1st edition, revision 1, and Decision No. 133/2019 of 13 May 2019 approved change to the document “Physical Protection Plan of SE-MO3&4“, 1st edition, revision 0, and its change approved by ÚJD SR within the scope of document sent “Physical Protection Plan of SE-MO3&4“, 1st edition, revision 2. ÚJD SR Decision no. 178/2020 of 6 June 2019 approved changes in physical protection plan for MO3&4 in extend of the submitted document “Physical Protection Plan for SE-MO3&4” 1st edition, revision 3. ÚJD SR Decision no. 329/2020 of 2 December 2020 approved changes in physical protection plan for MO3&4 in the extend of submitted document “Physical Protection Plan for SE-MO3&4” 1st edition, revision 4.
- l) RAW and SNF Management Plan, including their transport – was submitted by Slovenské elektrárne, a. s. as part of the submission of 12 December 2016. ÚJD SR had comments on the RAW and SNF Management Plan, including their transport, which it classified as

- deficiencies of the submission. To eliminate these deficiencies it determined a deadline by Decision No. 334/2017 of 23 August 2017 to suspend administrative proceedings. Slovenské elektrárne, a. s. submitted documentation to ÚJD SR with removed deficiencies. ÚJD SR confirmed removal of deficiencies of submission by letter reg. No. 766/2018 of 07 February 2018. On 8 November 2019, Slovenské elektrárne, a. s. submitted to ÚJD SR by letter ref. SE/2019/061205, an updated document “RAW and SNF Management Plan, including their transport“ PNM34483541 rev. 01, as a response to changes to generally binding legislation that have occurred since the submission of the original application. ÚJD SR accepted incorporated changes in accordance with the requirements of Section 21 of the Decree No. 58/2006, which it confirmed by sending letter reg. No. 1143/2020 dated 12 February 2020.
- m) Conceptual Decommissioning Plan – submitted by Slovenské elektrárne, a. s. as part of submission of 12 December 2016. ÚJD SR reviewed this document and had no requirements to supplement or modify this document. In November 2019, the applicant – by sending letter ref. SE/2019/061205 ÚJD SR, submitted an updated Conceptual Decommissioning Plan, as a response to changes to generally binding legislation that have occurred since the submission of the original application. ÚJD SR identified deficiencies in the submitted Conceptual Decommissioning Plan, and requested Slovenské elektrárne, a. s. to eliminate those deficiencies in the Final version of the Conceptual Decommissioning Plan, where the eliminated deficiencies are identified by ÚJD SR, Slovenské elektrárne, a. s. by letter ref. 2020/016057 of 16 March 2020. ÚJD SR gave favourable opinion on the document, Conceptual Decommissioning Plan for the nuclear installation Mochovce NPP Units 3&4, PNM34483534 rev. 02 by letter reg. No. 2821/2020 of 30 April 2020. In this letter, the ÚJD SR states that the document, Conceptual Decommissioning Plan for the nuclear installation Mochovce NPP Units 3&4, PNM34483534 rev. 02, meets the requirements of Section 22 of the Decree No. 58/2006.
- n) Proof of the provision of financial cover for liability for nuclear damage, excluding repository under a specific regulation — compliance is provided in par. 11) of the Reasoning.
- o) Training System – last change implemented to the training system for the staff of the license holder was approved by ÚJD SR Decision No. 327/2018 of 28 November 2018, and ÚJD SR Decision No. 186/2020 of 24 June 2020.
- p) Training programs for selected staff – last changes implemented were approved by ÚJD SR Decision No. 756/2015 of 15 December 2015, No. 97/2016 of 22 March 2016, No. 393/2016 of 27 July 2016, No. 355/2017 of 25 September 2017, No. 25/2018 of 13 February 2018, and No. 201/2020 of 8 July 2020.
- q) Training Programs for professionally qualified staff – were approved by ÚJD SR Decision No. 123/2016 of 22 March 2016 and No. 315/2018 of 28 November 2018.
- r) Evidence of fulfilment of qualification requirements of selected staff and professionally competent staff – Slovenské elektrárne, a. s. submitted part of the required documents in the supplement to the submission of 28 August 2018. This documentation was not complete, as the training of specially qualified staff and professionally qualified staff was still ongoing as of the given date. In November and December 2019, ÚJD SR conducted inspection at Slovenské elektrárne, a. s., MO3&4, focusing on staffing of job positions having impact on nuclear safety in the department of future operation, asset management and engineering support for future operation of Unit 3. During this inspection, Slovenské elektrárne, a. s. submitted documentation demonstrating the following facts:
- All job positions of specially qualified staff pursuant to Section 24 par. 2 of the Atomic Act, who are necessary for the operation of Unit 3, are staffed by employees with completed professional training. These employees have valid certificates of special professional competence pursuant to Section 8 of the Decree No. 52/2006, and authorization to perform work activities pursuant to Section 10 of the Decree No. 52/2006.
 - Job positions of professionally qualified staff pursuant to Section 24 par. 1 of the Atomic Act in the departments of future operation, asset management and engineering support for future operation of MO3&4, are staffed by employees to the extent necessary for the operation of Unit 3. The number of vacant job positions does not exceed the normal values of fluctuation

and staffing of these positions is continuously being dealt with by Slovenské elektrárne, a. s.. The workers have completed training and hold authorizations for performance of work activities pursuant to Section 10 of the Decree No. 52/2006.

Slovenské elektrárne, a. s. documented the readiness of its staff for the management of RAW, SNF and nuclear materials and for the commissioning of Unit 3 in the Final Report for Unit 3. In August 2020, ÚJD inspectors carried out inspection confirming the readiness of the personnel for the management of RAW, nuclear materials, SNF and commissioning of Unit 3.

- s) Documents on readiness for commissioning – Slovenské elektrárne, a. s. submitted documentation to ÚJD SR – protocols on testing of systems and equipment. The inspection of the course of testing of systems and equipment, and of protocols on their testing took place during ÚJD SR inspections at Mochovce. The subject of the inspection was the implementation of programs of inactive testing:

3P001	Program of tests and reactor erection work and reactor concrete shaft equipment	Completed to the extent of the current state of reactor preparation for commissioning. Implementation will be completed as scheduled in the final stage of preparation of the reactor for commissioning
3P002	Program of tests of HRK drives	Program completed
3P004	Program for handling steel samples of reactor pressure vessel	Completed to the extent of the current state of reactor preparation for commissioning. Implementation will be completed as scheduled in the final stage of preparation of the reactor for commissioning
3P005	Program of tests and settings on steam generators	Program completed
3P006A	Program of tests and settings of primary circuit equipment – main circulation water pumps	Program completed
3P006B	Program of tests and settings of primary circuit equipment – main circulation pipes and main shut-off valves	Program completed
3P007	Testing and Setup Program for oil management system of main circulation pumps	Program completed
3P008	Testing and Setup Program for equipment of the pressurizer system	Program completed
3P009	Equipment and manipulator testing program	Program completed
3P010	Test Program for equipment for reception, storage and transport of fresh fuel	Program completed
3P011	Test Program for sampling system for checking hermetic cover	Program completed
3P012	Test Program for equipment of reactor fuel loading machine	Program completed
3P013	Test Program for transport of reactor internals and of reactor upper block	Program completed
3P014	Test Program for equipment for replacement of absorbent parts of ARK control and extension rods	Program completed
3P015	Test Program of the reactor main dividing plate	Program completed

	screw tightener	
3P016	Program of start-up work for transport equipment, inspection and tests of HRK drives	Program completed
3P017	Test Program for handling ionization chambers	Program completed
3P019	Test Program for the system of SNF storage and handling	Completed to the extent of inactive tests, the program will be fully implemented after the establishment of the controlled zone
3P020	Program of testing equipment for preparation of transport container for SNF removal	Completed to the extent of inactive tests, the program will be fully implemented after the establishment of the controlled zone
3P021	Program of testing continuous purification system of primary circuit water	Program completed
3P022	Program of testing the make-up system for the primary circuit and boric acid control	Program completed
3P023	Test Program for oil management system make-up pumps	Program completed
3P024	Program of functional tests for the spent fuel pool cooling system	Program completed
3P025	Test Program for hydrogen burning system	Completed to the extent of inactive tests
3P026	Test Program of organized leak system of primary circuit	Program completed
3P027	Test Program of the KWA system for flushing ASRTP sensors	Program completed
3P028	Test Program of steam generators blowdown system	Completed to the extent of inactive tests
3P029	Program of tests of primary circuit drainage water purification system	Completed to the extent of inactive tests
3P030	Test Program for active water collection system	Program completed
3P031	Evaporator test program	Program completed
3P032	Test Program of condensate purification from evaporator	Program completed
3P033	Test Program of clean condensate system	Program completed
3P034	Functional tests of ŠOV-4 system, ŠOV-4 purification	Program completed
3P035	Test Program of boron concentrate purification	Program completed
3P036	Test Program for the make-up system of boron concentrate	Program completed
3P037	Program for testing the chemicals preparation system	Program completed
3P038	Test Program for treatment station for technological venting	Completed to the extent of inactive tests
3P039	Test Program of water treatment station for the pool and the emergency system tanks	Program completed
3P040	Test Program of blowdown treatment station system of steam generators - filters	Program completed
3P041	Program of tests for emergency systems make-up and core cooling	Program completed

3P042	Test Program of primary circuit cooldown after seismic event	Program completed
3P043	Test Program of pressure relief system in hermetic spaces and leaks localization	Program completed
3P044	Test Program of intermediate cooling system, main circulation pumps	Program completed
3P045	Test Program of intermediate drives cooling system	Program completed
3P046 A, B, C, D	RAW management programs	Program completed
3P047	Test Program of technological venting system of tanks (KPP)	Program completed
3P051A	Functional Test Program of Operational diagnostics A, Unit 3	Completed to the extent of inactive tests
3P051B	Functional Test Program of Operational diagnostics B, Unit 3	Program completed
3P051C	Functional Test Program of Operational diagnostics C, Unit 3	Program completed
3P051D	Functional Test Program of Operational diagnostics D, Unit 3	Program completed
3P051E	Functional Test Program of Operational diagnostics E, Unit 3	Program completed
3P051F	Functional Test Program of Operational diagnostics F, Unit 3	Program completed
3P051H	Functional Test Program of Operational diagnostics H, Unit 3	Program completed
3P051N	Functional Test Program of Operational diagnostics N, Unit 3	Completed to the extent of inactive tests
3P051R	Functional Test Program of Operational diagnostics R, Unit 3	Program completed
3P052	Test Program of emergency support centres	Program completed
3P053A, B, C	Functional Test Program of radiation control in the main generating unit – Unit 3, retrofitting and electrical part	Program completed
3P054	Test Program for room and equipment decontamination, Unit 3	Program completed
3P055	Functional Test Program of sampling system	Program completed
3P056A	Functional Test Program of HVAC systems of hermetic zone	Completed to the extent of inactive tests
3P056B	Functional Test Program of HVAC systems of the airtight zone	Completed to the extent of inactive tests
3P056C	Functional Test Program of HVAC air supply systems	Program completed
3P056D	Functional Test Program of radiation control room ventilation	Program completed
3P056E	Functional Test Program of HVAC for the building of active auxiliary operations	Program completed
3P057	CCTV functional test program	Program completed
3P058	Functional Test Program for measurement of hydrogen concentration in the hermetic zone	Program completed
3P059	Functional Test Program for ASFES Unit 3	Incomplete program implementation, missing verification of communication

		with the turbine control system will be completed before start of commissioning.
3P060	Program of passivation of internal surfaces of primary circuit during 2. HS	Program completed
3P061A	Test of gravity filling of the spent fuel cooling pool from flumes of the system to localize accidents	Program completed
3P061B	Test of opening connection from A301/1 to A201/1	Program completed
3P061C	Verification of operation of valves of emergency venting of steam generators and reactor	Program completed
3P061D	Verification of the functional capability of JMN pumps in flow mode to spraying collector	Program completed
3P061E	Test of coolant drain from bubbler flume to the floor of steam generator box	Program completed
3P062A	Testing the throughput of super-emergency supply routes using pumps of the Plant Fire Unit	Program completed
3P062B	Testing throughput of gasoline pumps from coolant pool to the ESW system	Program completed
3P063A	Verifying the ability to cool the primary circuit with PSA PG, PV PG system and low-pressure emergency make-up system	Program completed
3P063B	Verifying configuration of system of emergency source of coolant and its ability to replenish the coolant according to the design	Program completed
3P063C	Test of gravity replenishment of water to steam generators from supply tanks	Program completed
3P064	Functional Test Program of pneumatic quick-acting valves – Unit 3	Program completed
3P065	Functional test of valves and drive controllers	Program completed
3P066	Comprehensive ESFAS tests, Unit 3	Program completed
3P067	Program of APS testing in the stage of inactive tests and start-up	Program completed
3P069	Recovery of temporary 6kV power supply from EMO 2	Program completed
3P070	110 kV substation, EMO1-3	Program completed
3P071	Stand-by transformer 63 MVA, Unit 3	Program completed
3P072	400kV substation, 300 MVA, 32 MVA transformers, Unit 3	Program completed
3P073	Test Program for the first connection of TG31, Unit 3	Completed to the extent of inactive tests
3P074	Test Program for the first connection of TG32, Unit 3	Completed to the extent of inactive tests
3P075	Test Program for the start of commissioning VS switchboards, Unit 3	Program completed
3P076	Secured power supply category 1, Unit 3	Program completed
3P077	High voltage switchboard, Unit 3	Program completed
3P077B	High voltage switchboard, Unit 3, interconnections	Completed to the extent of inactive tests
3P078	Low voltage switchboard, unit 3	Program completed
3P079	Essential Service Water System, pumping station	Program completed

	and forced draft cooling towers, Unit 3	
3P080	System of non-essential cooling water, pumping station and cooling towers Unit 3	Program completed
3P081	Cooling water Unit 3, functional tests program	Program completed
3P082	Distribution system for demi water, 1 MPa, Unit 3	Completed to the extent of inactive tests
3P083	Secondary circuit HVAC systems, Unit 3	Program completed
3P084	Test Program "Mobile Diesel Generator for Unit 4"	Program completed
3P085	Turbine hall condensate collection tank, Unit 3	Program completed
3P086	Main condensate system	Program implementation will be completed after cancellation of the secondary circuit conservation mode
3P087	Super emergency power supply, Unit 3	Program completed
3P088	Power supply system, Unit 3	Completed to the extent of inactive tests
3P089	Live steam system, Unit 3	Completed to the extent of inactive tests
3P090	Generator and auxiliaries	Completed to the extent of inactive tests
3P091A,B	Functional test of TG I&C, Unit 3	Completed to the extent of inactive tests
3P092, 3P093	Program of turbine functional tests	Completed to the extent of inactive tests
3P094	ASDR terminal tests	Completed to the extent of inactive tests
3P095	Program of generator functional tests and auxiliaries	Completed to the extent of inactive tests
3P096	DGS, Unit 3	Program completed
3P096A	Functional test of DGS I&C, Unit 3	Program completed
3P096B	Program of tests for DG Unit 3 - electrical part	Program completed
3P096C	Diesel generator Unit 3 - HVAC systems	Program completed
3P097	Program of EPS tests	Program completed
3P098	Low-pressure compressed air system, Unit 3	Program completed
3P099	Turbine vacuum system	Completed to the extent of inactive tests
3P100	Test Program for the Central Electrical Control Room, Unit 3	Program completed
3P101	Communication equipment and data network, Unit 3	Program completed
3P102	Distribution of technical gases	Program completed
3P103	Primary circuit cooldown system, Unit 3	Program completed
3P105	Chemical treatment of condensate (BÚK)	Additional modifications are underway on the system, program will be completed by the start-up of turbine hall (start of ES)
3P106	HP air Program, Unit 3	Program completed

3P107	Sampling System, Unit 3	Completed to the extent of inactive tests
3P110	Steam from auxiliary boiler room, Unit 3	Completed to the extent of inactive tests
3P111A	Integral test of I&C system, secondary circuit	Completed within the scope of inactive tests except for the BÚK part. Will be completed to start-up of the turbine hall (start of ES)
3P114	Functional tests of terminals from 6 kV and 0.4 kV switchboards for power supply of consumers of nuclear island	Program completed
3P122	Comprehensive tests electrical, Unit 3 under load	Program completed
3P127	Program of functional tests of essential and non-essential service water distribution, Unit 3	Program completed
3P133A, B	Program of functional tests of TXS system	Program completed
3P134	Switchgear (24 V) power supply test program for safety systems - Individual Test "B"	Program completed
3P135A	Test Program of reactor limitation system - Individual Test "B"	Program completed
3P135B	Test Program of reactor limitation system	Program completed
3P136	Test Program of post-accident monitoring system PAMS/SAMS	Program completed
3P137A1	Test Program of EXCORE system	Completed to the extent of inactive tests
3P137A2	Program of comprehensive testing of EXCORE system	Implementation will be completed after the establishment of controlled zone
3P137B	INCORE, Program of functional tests	Program completed
3P137B1	INCORE, Program of integral tests	Completed to the extent of inactive tests
3P137C	Program of functional tests of neutron solution analyzers for NAR-I	Implementation will be completed after the establishment of controlled zone
3P137C1	Program FuS PTK Boron	Program completed
3P137D	Program of functional tests RVLMS, CETM system	Program completed
3P137D2	RVLMS, Program FuS power supply equipment	Program completed
3P137E	INCORE, MS-S, Program of functional tests of power supply equipment	Program completed
3P137F	MS-S, Program of functional tests	Program completed
3P137F1	MS-S, Program of integral tests	Program completed
3P138A, B	Program of functional tests of TXS and AO RTB switches	Program completed
3P139	Program of testing the integration of bus-interconnected systems	Program completed
3P140A, B	Program test of reactor power management system RCS	Program completed
3P141A	Test Program for the main control system NI+CI - T2000 - Individual test "B"	Program completed

3P141B	Test Program of the main control system of nuclear and conventional island	Completed within the scope of inactive tests, except BÚK part. Will be completed at the start-up of the turbine hall (start of ES)
3P142	Test Program of primary circuit measurements	Completed within the scope of inactive tests. Verification of the H3BO3 concentration measurements needs to be added. Technologically linked to increase in boric acid concentration to shutdown state. Will be completed before the start of commissioning
3P143	Test Program for seismic monitoring system	Program completed
3P144A	Test Program "loop check" – TXS	Program completed
3P144B	Test Program "loop check" - T2000	Completed within the extent of inactive tests, except BÚK parts. Will be completed at the start-up of turbine hall (start of ES)
3P145	Program of testing electromagnetic compatibility of primary circuit	Program completed
3P146	Test Program of chemical monitoring system - Individual Test "B"	Program implementation not completed. Will be completed before the start of commissioning
3P147	MCS Single time system	Program completed
3P148	Test Program for TXS system resistance	Program completed
3P149	Functional test of the autonomous control and management system for secondary circuit HVAC	Program completed
3P150	Functional test of autonomous HVAC unit of split type (SPLIT)	Program completed
3P160	Secondary switchboards, LV, Unit 3, nuclear island	Program completed
3P161	Program of functional tests of heat removal system and combustion products – Unit 3	Program completed
8P056F	Program of functional tests of HVAC, A/C and I&C	Program completed
8P094	Test Program for ASDR system, common part	Program completed
8P115	Sludge conditioning	Completed implementation of the program in the range of operational requirements
8P116	Fire water system, seismically not resistant	Status stated in 8P116A, B, C, D, E.
8P116A	Fire extinguishing tests for Unit transformers	Program completed
8P116B	Fire extinguishing tests for stand-by transformers and station consumption transformers	Program completed
8P116C	Program of functional tests of fixed fire extinguisher for water mist seismically not resistant – Unit 3	Program implementation not completed. Additional modifications are being done

		on the system. Will by complete before fuel loading.
8P116D	Foam fixed fire extinguishers, oil tanks for TG	Program completed
8P116E	Fixed fire extinguisher seismically not resistant	Implementation completed to the extent of inactive tests
8P117	Fire water system seismically resistant	Program completed
8P117A	Program of functional tests of fixed fire extinguisher for water mist seismically resistant – Unit 3	Program implementation not completed. Additional modifications are being done on the system. Will by complete before fuel loading.
8P117B	Program of functional tests of fixed fire extinguisher FM200 seismically resistant – Unit 3	Program completed
8P117C	Program of functional tests of foam fixed fire extinguisher, DGS – Unit 3	Program completed
8P118	Chilled water system 6/12 °C	Program completed
8P119	Raw water treatment, Units 3&4	Program completed
8P120	Reserve water source	Program completed
8P121	Common diesel generator Units 3&4	Program completed
8P121A	Common diesel generator – electrical part	Program completed
8P121B	Separate I&C, common diesel generator	Program completed
8P125	Test of power supply and control of consumers designed to deal with severe accidents	Program completed
8P126	Functional test of autonomous system of high pressure air control and management	Program completed
8P128	Test of communication with the single time system	Program completed
8P129	HRS power loss test	Program completed
8P130	Functional test of HRS control system	Program completed
3P200	Pressure test program for detachable parts of the primary circuit	Program completed
3P201	Program of cold hydraulic test	Program completed
3P202	Program of Unit 3 minor revision	Program completed
3P203	Program of hot hydraulic test, Unit 3	Program completed
3P204	Program of extended revision, Unit 3	Continuation after completion of PC conservation
3P205	Program for measuring hydraulic characteristics of primary circuit, R and VCR at 2. HS	Program completed
3P206	Determination of flow distribution unevenness	Program completed
3P207	Program of chemical regimes in individual stages of inactive tests	Program completed

Documents of readiness, as well as the testing of equipment according to individual programs of inactive tests, were verified by ÚJD SR inspectors during inspections in Mochovce. Several of these programs are of omni-professional nature, and cannot be clearly assigned to specific permits under this Decision, namely the permit for commissioning of Unit 3 (in the operative part of the Decision designated as B), or the permit for the management of RAW, SNF and the management of nuclear materials – fresh nuclear fuel (in the operative part of the Decision designated as A). An example of such programs of inactive tests are the following programs: 3P065, 3P068, 3P070, 3P071, 3P072, 3P076, 3P077, 3P078, 3P080,

3P098, 3P114, 3P142, 3P145, 3P146, 3P160, 8P116, 8P116E, 8P117B and other, verifying the operability of equipment common to the operation of the Unit, RAW and SNF management, as well as fresh fuel management. Some of the equipment test programs can be clearly assigned to permits (A) or (B) from the operative part of this Decision according to the purpose of the tested equipment. RAW management equipment tests include programs 3P046A, B, C, D, 3P056E and 3P030. Testing of equipment for SNF management include the following programs: 3P019, 3P020 and 3P024. Testing of equipment for the management of nuclear materials within the scope of fresh fuel, excluding the fresh fuel node, include programs 3P010 and partly also 3P012.

Part of the activities related to the management of nuclear material (fresh nuclear fuel) is carried out outside the fresh fuel node, and is therefore beyond the scope of the permits for the management of fresh nuclear fuel in the fresh fuel node, authorized by ÚJD SR by its Decisions No. 277/2018 and No. 298/2018 of 29 October 2018, and confirmed by ÚJD SR appeal Decision No. 139/2019 P and No. 140/2019 P of 6 May 2019. Slovenské elektrárne, a. s. has installed equipment, which is designed to manage fresh nuclear fuel outside the fresh fuel node and performs its testing. Taking these facts into account, and applying appropriately Section 19 par. 2 of the Code of Administrative Procedure, ÚJD SR issues by this Decision also permit for the management of nuclear materials (fresh nuclear fuel) pursuant to Section 5 par. 3 (g) of the Atomic Act within the scope of objects and facilities for the operation of Unit 3, and in the scope of objects and facilities common to Units 3&4 used for operation of Unit 3, excluding the fresh fuel node (management of nuclear material in the scope of handling and storage of fresh nuclear fuel in the fresh fuel node, ÚJD SR Decision No. 277/2018, confirmed by ÚJD SR Decision No. 140/2019 P).

- t) Population Protection Plans in case of incident or accident of nuclear installation, Nuclear Power Plant Mochovce, in the territorial districts of Banská Bystrica and Nitra Regions – reviewed by ÚJD SR Decision No. 135/2020 of 1 April 2020 and No. 232/2020 of 27 July 2020 and approved by the Ministry of Interior of the Slovak Republic on 8 September 2020 No. SKR-COPK2-2020/405-14 and on 27 November No. SKR-COPK22020/405-48.
 - u) Demarcation of the boundaries of a nuclear installation – approved by ÚJD SR Decision No. 922/2014 of 12 December 2014.
 - v) Definition of the size of the area under threat by nuclear installation – approved by ÚJD SR Decision No. 1040/2012 of 23 November 2012.
 - w) Documentation under the Building Act – was gradually submitted to oral hearings connected with visual inspections (local survey) for individual objects of Unit 3 and common objects to Units 3&4, that are needed for operation of Unit 3.
- 10) Documentation required by the Building Act for early use of the building pursuant to Section 6 par. 2 (j) of the Atomic Act
- Slovenské elektrárne, a. s. submitted the documentation on oral hearings connected with visual inspections (local surveys) for individual objects of Unit 3 and common objects to Units 3&4, needed for operation of Unit 3.
- 11) Liability insurance for nuclear damage pursuant to Section 8 par. 1 and 2 of Act No. 54/2015 Coll. on civil liability for nuclear damage and its financial coverage, and on amendments to certain laws (hereinafter referred to as the “Act No. 54/2015 Coll.”).
- By letter ref. SE/2021/000479/Ov dated 7 January 2021, registered by ÚJD SR under No. 224/2021, Slovenské elektrárne, a. s. submitted notification on demonstration of financial coverage of operator liability for damage caused by a nuclear incident for the MO3&4 site, with effect from 1 January 2021, including the amount of the insurance contributions of the policyholders for that site. Annex to the letter was Insurance Contract No. EL044SR21 which covers the share of the coverage of the statutory limit of liability for nuclear damage of 59%. By letter dated 6 January 2021, registered by ÚJD SR under No. 296/2021, notification was received from the Slovak Nuclear Insurance Pool on provision of insurance cover for the nuclear operator’s liability for nuclear damage with a share of liability insurance coverage of 41 %. It is apparent from the documentation submitted that in the part of the obligation to

cover liability for nuclear damage, the requirements for financial cover for nuclear liability are met in the prescribed manner and up to the limit laid down by the Act No. 54/2015 Coll.

- 12) Pursuant to Section 7 par. 5 of Atomic Act, a special condition for issuing permit according to Section 5 par. 3 (b), (f), (g) of Atomic Act, is the approval of the physical protection plan. ÚJD SR Decision No. 154/2018 of 24 May 2018 approved the document “Physical Protection Plan of MO3&4 UČP/fresh fuel node“, edition 1, revision 0. ÚJD SR Decision No. 280/2018 of 10 October 2018 approved a changes to the document “Physical Protection Plan for MO3&4 UČP“, edition 1, revision 0 to the extent of the document sent: “Physical Protection Plan for MO3&4 UČP“, edition 1, revision 1, and Decision No. 134/2019 of 13 May 2019, approved changes to the document “Physical Protection Plan for MO3&4 UČP“, edition 1, revision 0, and its change approved by ÚJD SR within the sent document “Physical Protection Plan for MO3&4 UČP“, edition 1, revision 2. ÚJD SR Decision No. 39/2020 of 30 January 2020 approved the change to the physical protection plan for MO3&4 UČP within the scope of the document “Physical Protection Plan for MO3&4 UČP“, edition 1, revision 3. The ÚJD SR Decision no. 328/2020 of 12 December 2020 approved changes in physical protection for MO3&4 UČP in th extend of submitted document “Physical Protection Plan for MO3&4 UČP” 1st edition, revision 2. The ÚJD SR Decision No. 260/2018 of 14 September 2018 approved the “Physical Protection Plan for SE-MO3&4“, edition 1, revision 0. ÚJD SR Decision No. 281/2018 of 10 October 2018 approved the change to the document “Physical Protection Plan for SE-MO3&4“, edition 1, revision 0 within the scope of the document “Physical Protection Plan for SE-MO3&4“, edition 1, revision 1, and ÚJD SR Decision No. 133/2019 of 13 May 2019 approved changes to the document “Physical Protection Plan for SE-MO3&4“, edition 1, revision 0, and its change approved by ÚJD SR within the scope of the document “Physical Protection Plan for SE-MO3&4“, edition 1, revision 2. ÚJD SR Decision no. 178/2020 of 6 June 2019 approved changes in physical protection plan for MO3&4 in extend of the submitted document “Physical Protection Plan for SE-MO3&4” 1st edition, revision 3. ÚJD SR Decision no. 329/2020 of 2 December 2020 approved changes in physical protection plan for MO3&4 in the extend of submitted document “Physical Protection Plan for SE-MO3&4” 1st edition, revision 4.
- 13) Information required by a special regulation – Treaty establishing the European Atomic Energy Community pursuant to Section 12 par. 5 of the Atomic Act.
- Slovenské elektrárne, a.s. submitted a letter SE/2016/067700 on sending of basic technical characteristics (hereinafter only as the “BTC“) ÚJD SR, and a letter SE/2016/007696 on sending BTC to the European Commission, with the attached Report on the basic technical parameters for MO3&4 site. The submission of the report is in accordance with Article 4 of Commission Regulation (Euratom) No. 302/2005 of 8 February 2005 on the application of the Euroatom safeguards scheme. BTC was updated as at 23 March 2018 and sent by SE, a. s. letter SE/2018/021092 of 5 April 2018, and then as at 27 August 2020.

Slovenské elektrárne, a. s. submitted a report to ÚJD SR on the implementation of the project of installation surveillance equipment of the International Atomic Energy Agency (hereinafter referred to as the “IAEA“) and of the European Commission.

The surveillance equipment was installed by a responsible staff member of the European Commission on 10 and 11 December 2019. The functionality of the IAEA and European Commission surveillance equipment was confirmed by IAEA and European Commission inspectors during international inspection No. 828/2020 held on 29 October 2020, which focused on the registration and control of nuclear materials.

By Decision No. 334/2017 of 23 August 2017, ÚJD SR sub-divided the application of Slovenské elektrárne, a. s. for the issue of permits related to the commissioning of MO3&4 into administrative proceedings Nos. 1.1, 1.2 and 1.3 (related to the fresh fuel node), Nos. 2.1, 2.2 and 2.3 (related to Unit 3), and Nos. 3.1, 3.2 and 3.3 (related to Unit 4) due to the dual-unit structure of the MO3&4 plant, and the time sequence of anticipated activities during the gradual preparation of equipment, systems and objects of MO3&4 for commissioning. Part of the documentation submitted

by Slovenské elektrárne, a. s. under administrative proceedings 2.1, 2.2 and 2.3 relate only to Unit 3 and facilities common to Units 3&4, which are needed for operation of Unit 3, part of the documentation demonstrated compliance with the requirements of the legislation in force not only for Unit 3 and common facilities to Units 3&4, which are needed for operation of Unit 3, but also for Unit 4, or for nuclear installation of MO3&4 as a whole – in particular documentation listed in points 7), 9f), 9h) to 9j), 9l) to 9o), 9t) to 9v), 11) and 12). ÚJD SR reviewed this documentation in full, which indeed exceeds the scope required for administrative proceedings 2.1, 2.2 and 2.3.

By letter reg. No. 7772/2018 dated 4 December 2018, the first-instance administrative authority requested the Chairperson of ÚJD SR as the Appellate Administrative Authority in accordance with Section 58 par. 1 and Section 61 par. 2 of the Code of Administrative Procedure for the extension of the time period for taking the decision in administrative proceedings 2.1, 2.2, 3.1 and 3.2 by 6 months pursuant to Section 49 par. 2 of the Code of Administrative Procedure. The first instance authority justified its request by the large extent of inspection activities to be carried out before the start of commissioning of Unit 3 of MO3&4, in order to fully comply with Section 46 of the Code of Administrative Procedure, which provides that the Decision must be based on a reliably established state of affairs. The Chairperson of ÚJD SR complied with the request of the first-instance administrative authority and extended the time period for taking the decision by 6 months. The parties and other authorities concerned were informed about the extension of the period by ÚJD SR letters reg. No. 157/2019, 158/2019 and 7058/2018 dated 7 January 2019.

The fulfilment of the conditions of the ÚJD SR Decision No. 266/2008, relating to Unit 3, is as follows:

- Condition 1 and 2 (Condition 1 “In accordance with the best international practice, to complete the project of nuclear installation of Units 3&4 of Mochovce with reference scenario, involving deterministic effect from an external source, e.g. the impact of a small aircraft and submit it to ÚJD SR for review“, and Condition 2 “Based on a scenario developed according to Condition 1, assess the functional resilience potential of Units 3&4 project of NPP Mochovce, and apply appropriate additional systems, structures or components in the project, as well as NPP management strategies, in order to ensure its resilience to possible deterministic effects from an external source, e.g. deliberate impact of a small aircraft, so as to bring the project in line with the best international practice. Relevant changes to the basic design to be submitted to ÚJD SR in accordance with the applicable legislation“). Slovenské elektrárne, a. s. submitted the relevant documents to the ÚJD SR. Their contents is classified. ÚJD SR issued Decision No. 290/2010 of 16 August 2010, permitting the construction of a protective barrier. Related documentation is subject to classified information regime pursuant to Act No. 215/2004 Coll. on the protection of classified information and on amendments to certain laws as amended (hereinafter only as “Act No. 215/2004 Coll.“), and for this reason it has not been disclosed to the public. ÚJD SR considers conditions 1 and 2 of the Decision No. 266/2008 to be fulfilled.
- Condition 3 (In accordance with established practice at Slovak nuclear installations in operation with good international practice, and with the recommendations given in the IAEA Doc. NS-G-1.10, to implement double seals on all hermetic doors and hermetic hatches at the containment boundaries of a nuclear installation Units 3&4, with the possibility of testing the space between the seals. The modification in question was implemented and its implementation was checked by the ÚJD SR inspectors directly in Mochovce.
- Conditions 4, 5, and 6 (Supplement more specified calculations of seismic resistance of equipment, whose seismic resistance is required by the basic design and their verification by an independent organization, develop instructions for authors of detailed designs for calculations of anchoring components, whose seismic resistance is required and to ensure independent inspection of a detailed designs of all operational sets containing seismically qualified components). Slovenské elektrárne, a. s. submitted the required documentation to ÚJD SR and ÚJD SR confirmed compliance with the conditions of the Decision No. 266/2008 in writing (ÚJD SR letter reg. No. 4989/2015 dated 6 August 2015 – Condition No. 4, letter

reg. No. 443/320-150/2009 dated 4 May 2009 – Condition 5 and letter reg. No. 4989/2015 dated 6 August 2015 – Condition 6).

- Condition 7 (Ensure that re-assessment of nuclear safety is carried out at the next stages of the nuclear project in accordance with the requirement of Annex 3 part B (I) (A) (u) of the ÚJD SR Decree No. 50/2006, laying down details of nuclear safety requirements for nuclear installations during their siting, design, construction, commissioning, operation, decommissioning and when closing a repository, as well as criteria for categorization of safety related equipment into safety classes (hereinafter only as “Decree No. 50/2006”) in the text effective at the date of issue of the Decision No. 266/2008. This requirement is stated in Annex 3 part B (I) (A) par. 20 of the Decree No. 430/2011. Compliance with this condition was confirmed by ÚJD SR letter reg. No. 1104/320-353/2009. All modifications to the basic design are made by the author of the basic design, and the author of the basic design confirms the compliance of the design and the detailed design documentation with the basic design. ÚJD SR approves the documentation of the license holder in accordance with the requirements of the Atomic Act and related ÚJD SR decrees. Nuclear safety assessment is contained in the PSR of MO3&4.
- Condition 8 (Take actions referred to in Chapter 7.5 of the Interim Safety Report to ensure a risk balance in terms of the probabilistic safety assessment between the power and no power states of operation of a nuclear installation. Technical report on the modifications made to be submitted to ÚJD SR) – this condition is fulfilled in the current revision of the PSA study. The risk between power and no power states is balanced.

Compliance with the conditions of ÚJD SR Decision No. 267/2008 is incorporated in the relevant chapters of PSR MO3&4, as follows:

- Condition 1 from the annex to the Decision (Add to the relevant part of Chapter 7 of PSR of MO3&4 a categorization of the list of postulated initiation events according to the frequency of possible occurrence as required by Annex 3, 3 Part B (I) (A) (l) of the Decree No. 50/2006 in force on the date of issue of the Decision No. 267/2008: – incorporated in Chapter 7.3.0 PSR of MO3&4. The above requirement of ÚJD SR Decree No. 50/2006 as in force at the date of Decision No. 267/2008, is identical with that of Annex 3 part B (I) (A) par. 12 of Decree No. 430/2011,
- Condition 2 from annex to the Decision (For analysed postulated initiation events to incorporate into the relevant part of Chapter 7 of PSR MO3&4, the requirement in accordance with Annex 3 part B (I) (B) (3) (a) of Decree No. 50/2006 in force on the date of issue of the Decision No. 267/2008 – is incorporated in Chapter No. 7.4 of PSR of MO3&4. The above requirement of Decree No. 50/2006 in force on the date of issue of the Decision No. 267/2008 in the current legislation is stated in Annex 3 Part B (I) (B) par. 3 (a) of Decree No. 430/2011,
- Condition 3 from the annex to the Decision (For analysed postulated initiation events to incorporate into the relevant part of Chapter 7 of PSR MO3&4, the requirement in accordance with Annex 3 part B (I) (B) par. 3 (c) of Decree No. 50/2006 in force on the date of issue of the Decision No. 267/2008 – is incorporated in Chapter 7.4 of PSR of MO3&4. The above requirement of Decree No. 50/2006 in force on the date of issue of the Decision No. 267/2008 in the current legislation is stated in Annex 3 part B (I) (B) par. 3 (c) of Decree No. 430/2011,
- Condition 4 from annex to the Decision (Add to the relevant part of Chapter 6 of PSR of MO3&4 an analysis of the effects of postulated initiation events for those systems and components, for which such an assessment is not specified, or to evaluate the possibility of influencing the operation of these systems and components in terms of the effect of external postulated initiation events in accordance with Annex 3 part B (I) (H) par. 7 of Decree No. 50/2006 in force on the date of issue of the Decision No. 267/2008 – incorporated in Chapter 6.0 of PSR of MO3&4. The above requirement of Decree No. 50/2006 in force on the date of issue of the Decision No. 267/2008 in the current legislation is stated in Annex 3 part B (I) (H) par. 7 of Decree No. 430/2011,
- Condition 5 from annex to the Decision (Amend Chapter 7.4.20 PSR of MO3&4 so that compliance with the requirement of Annex 3 part B (II) (E) par. 2 (a) (2) of Decree No.

50/2006 in force on the date of issue of the Decision No. 267/2008 is fully demonstrated, and taking into account current good practice in this area – is incorporated in Chapters 7.2.3.2 and 7.4 of PSR of MO3&4. The above requirement of Decree No. 50/2006 in force on the date of issue of the Decision No. 267/2008 is identical with the requirement of Annex 3 part B (II) (E) par. 2 (a) (2) of Decree No. 430/2011,

- Condition 6 from annex to the Decision (Amend Chapter 14 of PSR of MO3&4 to include the requirements and state the method of their fulfilment in order to maintain subcriticality in RAW management in accordance with the requirement of Section 21 par.3 (a) of Act No. 541/2004 Coll. in force on the date of issue of the Decision No. 267/2008 – is incorporated in Chapter 14 of PSR of MO3&4. The above requirement of the Act No. 541/2004 Coll. in force on the date of issue of the Decision No. 267/2008 in the current legislation is identical with the requirement of Section 21 par. 4 (a) of the Atomic Act,
- Condition 7 from annex to the Decision (Amend Chapter 14 of PSR of MO3&4 to include requirements and indicate how they are fulfilled to provide for residual heat removal in RAW management in accordance with the requirement of Section 21 par. 3 (b) of Act No. 541/2004 Coll. in force on the date of issue of the Decision No. 267/2008 – is incorporated in Chapter 14 of PSR of MO3&4. The above requirement of Act No. 541/2004 Coll. in force on the date of issue of the Decision No. 267/2008 in the current legislation is identical with the requirement of Section 21 par. 4 (b) of the Atomic Act,
- Condition 8 from annex to the Decision (Amend Chapter 14.6 of PSR of MO3&4 to include requirement according to Section 21 par. 10 of Act No. 541/2004 in force on the date of issue of the Decision No. 267/2008) – is incorporated in Chapter 14 of PSR of MO3&4. The above requirement of Act No. 541/2004 in force on the date of issue of the Decision No. 267/2008 in the current legislation is stated in Section 21 par. 11 of the Atomic Act,
- Condition 9 from annex to the Decision (Amend Chapter 14.6 of PSR of MO3&4 to include requirement that RAW samples are stored until received at the repository in accordance with the requirement of Section 3 par. 3 of Decree No. 53/2006 in force on the date of issue of the Decision No. 267/2008 – is incorporated in Chapter 14 of PSR of MO3&4. The above requirement of Decree No. 53/2006 in force on the date of issue of the Decision No. 267/2008 in the current legislation is stated in Section 3 par. 3 of ÚJD SR Decree No. 30/2012, laying down the details of requirements for the management of nuclear materials, radioactive waste and spent nuclear fuel as amended by Decree No. 101/2016 (hereinafter only as the “Decree No. 30/2012“) stated as follows: “At the crucial points of radioactive waste management, the license holder, pursuant to Section 5 par. 3 (f) of Atomic Act, takes samples, analyses and stores representative samples for documenting and evaluating radioactive waste management. Samples shall be kept until the radioactive waste is received at the repository and samples from the waste characterization during operation of the repository shall be kept until the end of operation of the repository“;
- Condition 10 from annex to the Decision (Relevant parts of Chapter 9 of PSR of MO3&4 to be supplemented with requirements for coordination of records of also other nuclear materials, such as fresh nuclear fuel and SNF) – is incorporated in Chapter 9.5 PSR of MO3&4,
- Condition 11 from annex to the Decision (Align the classification of nuclear materials in Chapter 9.5.5 of PSR with the Commission Regulation (Euratom) 302/2005, and to add the possibility to send nuclear materials from MBAs created in a nuclear installation of MO3&4) – is incorporated in Chapter 9.5 PSR of MO3&4,
- Condition 12 from annex to the Decision (In Chapter 11.05 of PSR of MO3&4, take into account radiation protection quality assurance program according to Annex 4 to Act No. 355/2007 Coll., as in force on the date of the Decision No. 267/2008 – is incorporated in Chapter 11.5 of PSR of MO3&4. Applicable Act No. 87/2018 Coll. includes an analogous requirement set out in part 2 of the Documentation for the application for permit,
- Condition 13 from annex to the Decision (Relevant parts of Chapter 11 of PSR of MO3&4 to be redrafted in a way to sufficiently utilize experience and knowledge from the operation of Units 1&2 of Mochovce NPP in the field of radiation protection) – incorporated in Chapter 11.5 of PSR of MO3&4,

- Condition 14 from annex to the Decision (In the section of Chapter 11 of PSR MO3&4, describing sources of radiation, add gamma and neutrons overlaps and to describe possible measures to exclude or limit overlaps) – incorporated in Chapter 11.2 of PSR MO3&4,
- Condition 15 from annex to the Decision (In the section of Chapter 11 of the Report, describing radiation sources, to supplement information on experience with the application of chemical regimes at Units 1&2 of Mochovce NPP in connection with radiation protection) – incorporated in Chapter 11.2 of PSR of MO3&4,
- Condition 16 from annex to the Decision (In the section of Chapter 11 PSR MO3&4, to complement radiation protection objectives, such as dose limit for workers, regulatory levels for individual exposure and objectives in the field of collective dose) – incorporated in Chapter 11.5 of PSR of MO3&4,
- Condition 17 from annex to the Decision (In the section of Chapter 11 of PSR MO3&4, to add an assessment on how the operation of Units 3&4 will affect individual doses of personnel working on all four Units of this power plant) – incorporated in Chapter 11.5 of PSR of MO3&4,
- Condition 18 from annex to the Decision (In Chapter 11 of PSR of MO3&4, add a statement that the provision of radiation protection is a primary condition for the safe operation of a nuclear installation, and for this purpose the department providing radiation protection management should be independent of economic and operational indicators) – incorporated in Chapter 11.5 of PSR MO3&4,
- Condition 19 from annex to the Decision (In Chapter 11 of PSR of MO3&4, complete, evaluate and emphasize the importance of the professional representative for radiation protection, his competencies, rights and obligations) – incorporated in Chapter 11.5 of PSR of MO3&4,
- Condition 20 from annex to the Decision (In Chapter 11 of PSR of MO3&4, reclassify work activities in the controlled zone into the relevant categories of risk rights in accordance with applicable legislation of the Slovak Republic) – incorporated in Chapter 11.5 of PSR of MO3&4,
- Condition 21 from annex to the Decision (In the relevant sections of PSR of MO3&4, to supplement the analysis of the possibility of errors and their consequences (FMEA) of all relevant systems, which will fully demonstrate the consequences of individual failures of elements on the operability of the system) – incorporated in Chapter 6.5.3 of PSR of MO3&4,
- Condition 22 from annex to the Decision (In the relevant sections of PSR of MO3&4 to supplement the analysis of internal flooding within the scope of the requirements of Chapter 2.5.4.3 of the approved requirements for the quality of nuclear installation of Units 3&4) – incorporated in Chapters 7.2.3.1 and 6.10 PSR MO3&4,
- Condition 23 from annex to the Decision (In the relevant parts of Chapters of PSR MO3&4, complement an analysis of events related to fires and flooding that are caused by seismic event in accordance with the requirements of the IAEA guide GS-G-4.1, 3.68 b) – incorporated in Chapters 7.2.3.2 and 6.0 of PSR MO3&4,
- Condition 24 from annex to the Decision (The process of commissioning of a nuclear installation, described in Chapter 8 of PSR MO3&4, to be brought in line with the requirements of Annex 4, part B (II) (A) (1) of Decree No. 50/2006 as amended as of the date of issue of the Decision No. 267/2008 – Chapter 8 PSR of MO3&4, redrafted according to Annex 4 part B (II) (A) (1) of Decree No. 430/2011,
- Condition 25 from annex to the Decision (Recalculate LERF and CDF values stated in Chapter 7.5.1 of PSR MO3&4 for a shut-down reactor) – incorporated in Chap. 7.3 PSR MO3&4,
- Condition 26 from annex to the Decision (Edit the content of Chapter 5.1.1.3 of PSR MO3&4 in such a way that it is fully compliant and demonstrates clear compliance with the requirements set out in Annex 3 part B (I) (C) (1) of Decree No. 50/2006, as amended as of the date of issue of the Decision No. 267/2008 – incorporated in Chapters 5.1 and 5.2 PSR MO3&4. The above requirement of the Decree No. 50/2006 as amended as of the date of issue

of the Decision No. 267/2008, is stated in Annex 3 part B (I) (C) (1) (c) of Decree No. 430/2011,

- Condition 27 from annex to the Decision (Add to the relevant parts of Chapters 5.2 and 7.4 of the Report, an information on, to what boundary conditions are systems and components important in terms of nuclear safety designed in accordance with the requirement stated in Annex 3 part B (I) (F) (1) Decree No. 50/2006 as amended as of the date of issue of the Decision No. 267/2008 – incorporated in Chapters 5.2 and 7.4 of PSR MO3&4. The above requirement of Decree No. 50/2006 as amended as of the date of issue of the Decision No. 267/2008, is set out in Annex 3 part B (I) (F) (1) of Decree No. 430/2011,
- Condition 28 from annex to the Decision (Add to the relevant safety analysis for non-power operating modes and shut-down reactor, application of simple failure criterion in accordance with the requirement set out in Annex 3 part B (I) (H) (1) Decree No. 50/2006 as amended as of the date of issue of the Decision No. 267/2008 – incorporated in Chapter 7.4 of PSR MO3&4. The above requirement of Decree No. 50/2006 as amended as of the date of issue of the Decision No. 267/2008, is stated in Annex 3 part B (I) (H) (1) of Decree No. 430/2011,
- Condition 29 from annex to the Decision (Add the relevant chapter of PSR MO3&4 on possible non-fulfilment of the simple failure criterion together with the reasoning in accordance with the requirements stated in Annex 3 part B (I) (H) (4) of ÚJD SR Decree No. 50/2006 as amended as of the date of issue of the Decision No. 267/2008 – incorporated in Chapter 7.4 of PSR MO3&4. The above requirement of Decree No. 50/2006 as amended as of the date of issue of the Decision No. 267/2008, is stated in Annex 3 part B (I) (H) (4) of Decree No. 430/2011,
- Condition 30 from annex to the Decision (To relevant chapters of PSR MO3&4, add an analysis of the risk of explosion or fire to determine the required fire resistance of fire-separation structures according to the requirement set out in Annex 3 part B (I) (I) (5) of ÚJD SR Decree No. 50/2006, as amended as of the date of issue of the Decision No. 267/2008 – incorporated in Chapters 7.2.3.1 and 7.2.3.2 of PSR MO3&4.
- Condition 31 from annex to the Decision (To relevant parts of PSR MO3&4, add an analysis of the combination of the effects of phenomena caused by natural conditions and human activity, in accordance with the requirement set out in Annex 3 part B (I) (J) par. 2 (b) No. 50/2006, as amended as of the date of issue of the Decision No. 267/2008 – incorporated in Chapter 7.2.3.2 of PSR MO3&4.
- Condition 32 from annex to the Decision (Complete safety analyses to fully comply with the requirements set out in Annex 3 part B (II) (F) of Decree No. 50/2006, as amended as of the date of issue of the Decision No. 267/2008 – the requirement is incorporated in Chapter 7.2.3.1 PSR of MO3&4. The above requirement of Decree No. 50/2006 as amended as of the date of issue of the Decision No. 267/2008, is stated in Annex 3 part B (II) (G) of the Decree No. 430/2011

By letter reg. No. 4594/2019 dated 25 June 2019, the first-instance administrative authority requested the Chairperson of ÚJD SR, as the appellate body pursuant to Section 58 par. 1 and Section 61 par. 2 of the Code of Administrative Procedure, and following Section 49 par. 2 of the Code of Administrative Procedure, for extension of the time limit for taking a decision in administrative proceedings Nos. 2.1 and 2.2 by 6 months. The first instance administrative authority justified its request by a large scope of control activities to be carried out after completion of the hot hydrotest at Unit 3, in particular by verifying full completion of all erection and installation work in the hermetic zone, by verifying the rectification of deficiencies and punch list items, as well as checking the readiness of the Unit for its re-heating, so that Section 46 of the Code of Administrative Procedure stating that the decision must be based on a reliably established state of affairs, is fully complied with. The Chairperson of ÚJD SR complied with the request of the first instance administrative authority and extended the time limit for the decision by 6 months. The parties and other authorities concerned were informed of the extension of the time limit for the decision by letters of ÚJD SR reg. No. 4683/2019 and 4681/2019 of 28 June 2019.

Slovenské elektrárne, a. s. gradually notified the ÚJD SR of the readiness of individual objects of Unit 3, or common objects for pre Units 3&4, which are necessary for operation of Unit 3, to continue the proceedings on the application of Slovenské elektrárne, a. s. for the issue of permit for early use of the building. ÚJD SR, using graded approach, properly evaluated the importance of these objects for nuclear safety. Only after confirmation of the readiness of the decisive objects to hold public hearings related to visual inspections (local surveys), in particular the main generation block, the auxiliary building and diesel generator station, it considered that the conditions for the continuation of administrative proceedings No. 2.3 were fulfilled, ÚJD SR notified the parties by letters reg. No. 6122/2019, 6124/2019 and 6125/2019 of 23 August 2019, of the continuation of the administrative proceedings No. 2.3 from 19 August 2019. Information on the continuation of the proceedings was published on the central official electronic notice board, in the form of a public decree at the municipal offices of Kalná nad Hronom and Nový Tekov, and the ÚJD SR website.

ÚJD SR, taking into account the requests of the representatives of the public authorities concerned (in particular the Fire and Rescue Services of SR and the Labour Inspectorate), and in accordance with the proposals of Slovenské elektrárne, a. s., organized hearings related to visual inspections (local surveys) by individual objects partially, so that the representatives of these state authorities have optimal conditions for carrying out the assessment of the situation in the areas that are within their competence.

Public hearings associated with visual inspections (local surveys) were held due to the large number of individual buildings and their extent, step-by-step for individual buildings (groups of buildings) or floors thereof, within the deadlines set by ÚJD SR. Notices on the dates of hearings related to visual inspections (local surveys) were also published on the official notice board and on the website of the municipality of Kalná nad Hronom, on the electronic notice board and website of ÚJD SR, and on the central portal of the public administration.

The proposal for the early use of individual buildings /floors has been examined at the site. The builder submitted the following documents for individual hearings linked to visual inspections (local surveys):

- A copy of the Final Building Permit,
- The Design Documentation certified by the building authority in the building procedure,
- Modifications to the Basic Design that are related to the relevant object,
- Accompanying technical documentation and construction logbooks.

The current status of individual buildings is in accordance with the documentation required by the conditions of the ÚJD SR Decision No. 246/2008 of 14 August 2008 on the permit of modification of the building before completion, which was confirmed by ÚJD SR Decision No. 291/2014 of 23 May 2014. The issue of ÚJD SR Decision No. 291/2014 was preceded by an appeal procedure, in which ÚJD SR Decision No. 79/2009 was issued. The ÚJD SR Decision No. 79/2009 was challenged by an action before the Regional Court Bratislava. Following an appeal against the decision of the Regional Court Bratislava, the Supreme Court of the Slovak Republic issued a ruling, referring the case to the ÚJD SR for new proceedings. As a result of the new procedure, a new second-instance ÚJD SR Decision No. 291/2014 was issued, which confirmed Decision No. 246/2008.

Technological equipment in individual objects has been tested/testing according to the prescribed programs and their readiness for commissioning has been evidenced in the rest reports in accordance with the state of their tests. Inspections for individual objects were performed in MO3&4 as follows:

No.	Name of object/building	date	Status of object
1.	Drinking water main Fire water main Drainage of in-plant siding	6 February 2019	suitable for early use of building

No.	Name of object/building	date	Status of object
2.	Side gate and fencing	8 January 2019	suitable for early use of building
3.	Sewage system Fire and service water main Thermal network Foundations of piping bridge	2 April 2019	suitable for early use of building
4.	Rainwater drainage Pumping of diesel and oil II. HVB	17 April 2019	suitable for early use of building
5.	Power lines, Industrial sewerage Colling water pipeline in towers circuit, Channels in towers circuit.	30 April 2019	suitable for early use of building
6.	Reactor building II. HVB +22.20 m, +29.10 m, +32.93 m, 34.20 m	25 June 2019	suitable for early use of building
7.	Oil management DGS Active auxiliary building. +18.60 m, +25.20 m	27 June 2019	suitable for early use of building
8.	Forced cooling towers II-1, II-2, II-3	9 July 2019	suitable for early use of building
9.	Cover mDG Unit 4	4 July 2019	suitable for early use of building
10.	SHN Unit 3	4 July 2019	suitable for early use of building
11.	Fuel oil system II.HVB	4 July 2019	suitable for early use of building
12.	Switch yard 110 kV and 400 kV	4 July 2019	suitable for early use of building
13.	Pumping station TVD II. HVB	9 July 2019	suitable for early use of building
14.	CČS TVN and non-system firewater II. HVB	25 July 2019	suitable for early use of building
15.	High pressure compressor station II. HVB	25 July 2019	suitable for early use of building
16.	DGS II. HVB	25 July 2019	suitable for early use of building
17.	Air duct to stack	30 July 2019	suitable for early use of building
18.	Bridge between I.HVB and II. HVB	30 July 2019	suitable for early use of building
19.	Draft cooling tower 41	30 July 2019	suitable for early use of building
20.	Draft cooling 32	30 July 2019	suitable for early use of building
21.	Trenches and channels of power cables – Part 2	27 August 2019	suitable for early use of building
22.	Bridge between II.HVB and SO 801/1-02	27 August 2019	suitable for early use of building
23.	Vent stack	27 August 2019	suitable for early use of building
24.	Backup water source – 2.HVB	27 August 2019	suitable for early use of building
25.	Common diesel generator station II. HVB	3 September 2019	suitable for early use of building
26.	Active auxiliary building -0,90 m, +5,10 m	5 September	suitable for early use of

No.	Name of object/building	date	Status of object
		2019	building
27.	Reactor Hall II. HVB, floors -10.5 m and -6,500 m	10 September 2019	suitable for early use of building
28.	Reactor Hall II. HVB in the extend of floors $\pm 0,00$ m, +3,00 m	12 September 2019	suitable for early use of building
29.	Reactor Hall II. HVB in the extend of floors +6,00 m	17 September 2019	suitable for early use of building
30.	Reactor Hall II. HVB in the extend of floors +10,500 m	19 September 2019	suitable for early use of building
31.	Reactor Hall II. HVB floor -2.80 m	26 September 2019	suitable for early use of building
32.	base of the transformer oil tanks II. HVB	26 September 2019	suitable for early use of building
33.	base of the cross rail for transformers II. HVB	26 September 2019	suitable for early use of building
34.	Premises of the electrical equipment along the Unit 3 and 4 floor +0,00 m	8 October 2019	suitable for early use of building
35.	Premises of the electrical equipment along the Unit 3 and 4 floor +0,00 m and +5,40 m	8 October 2019	suitable for early use of building
36.	Premises of the electrical equipment along the Unit 3 and 4 floor -6,40m and -5,70m	8 October 2019	suitable for early use of building
37.	Industrial air-conditioning	30 April 2019	stated in point 5
38.	Pipeline channels – Part 2	1 October 2019	suitable for early use of building
39.	Reactor Hall II. HVB in the extend of floor +14,100 m	10. October 2019	suitable for early use of building
40.	Reactor Hall II. HVB in the extend of floor +18,900 m	10. October 2019	suitable for early use of building
41.	Active auxiliary building +10,80 m	15 October 2019	suitable for early use of building
42.	Premises of the electrical equipment along the Unit 3 and 4, floor +5,40 m	17 October 2019	suitable for early use of building
43.	Premises of the electrical equipment along the Unit 3 and 4, floor -8,40 m, -7,95 m	17 October 2019	suitable for early use of building
44.	Premises of the electrical equipment transversely of Unit 3 (-7,0m)	22 October 2019	suitable for early use of building
45.	Premises of the electrical equipment along the Unit 3 and 4 (-3,6m)	22 October 2019	suitable for early use of building
46.	Premises of the electrical equipment transversely of Unit 3 (-3,6m)	22 October 2019	suitable for early use of building
47.	Premises of the electrical equipment along the Unit 3 and 4, floor +9,60 m	24 October 2019	suitable for early use of building
48.	Premises of the electrical equipment along the Unit 3 and 4, floor +18,60 m	24 October 2019	suitable for early use of building
49.	Premises of the electrical equipment along the Unit 3 and 4, floor +39,50 m	29 October 2019	suitable for early use of building
50.	Premises of the electrical equipment along the Unit 3 and 4, floor +14,70 m	29 October 2019	suitable for early use of building

No.	Name of object/building	date	Status of object
51.	Turbine Hall II. HVB floor +3.80 m	5 November 2019	suitable for early use of building
52.	Turbine Hall II. HVB floor +4.70 m	5 November 2019	suitable for early use of building
53.	Turbine Hall II. HVB floor +6.70 m	7 November 2019	suitable for early use of building
54.	Turbine Hall II. HVB floor +7,50 m	7 November 2019	suitable for early use of building
55.	Premises of the electrical equipment along the Unit 3 and 4, floor +22,50m	12 November 2019	suitable for early use of building
56.	Premises of the electrical equipment along the Unit 3 and 4, floor +26,750m	12 November 2019	suitable for early use of building
57.	Premises of the electrical equipment along the Unit 3 and 4, floor +31,00m	14 November 2019	suitable for early use of building
58.	Premises of the electrical equipment along the Unit 3 and 4, floor +35,50m	14 November 2019	suitable for early use of building
59.	Premises of the electrical equipment transversely of Unit 3, floor: +9,6m	19 November 2019	suitable for early use of building
60.	Premises of the electrical equipment transversely of Unit 3, floor: +14,7m	19 November 2019	suitable for early use of building
61.	Premises of the electrical equipment transversely of Unit 3, floor: +20,00m	19 November 2019	suitable for early use of building
62.	Turbine Hall II.HVB Floor: -3,10m	21 November 2019	suitable for early use of building
63.	Turbine Hall II.HVB Floor: -5,5m	21 November 2019	suitable for early use of building
64.	Turbine Hall II.HVB Floor: +0,00m	21 November 2019	suitable for early use of building
65.	Decarbonization and water treatment	22 November 2019	suitable for early use of building
66.	Piezometers – Part 2	22 November 2019	suitable for early use of building
67.	Internal roads – Part 2	22 November 2019	suitable for early use of building
68.	Pipeline laying to +-0,00 – Part 2	22 November 2019	suitable for early use of building
69.	Cooling water pipeline in tower circuit II.HVB	22 November 2019	suitable for early use of building
70.	Draft cooling tower 31	22 November 2019	suitable for early use of building
71.	Turbine hall II.HVB floor +9,60m	26 November 2019	suitable for early use of building

No.	Name of object/building	date	Status of object
72.	Turbine hall II.HVB floor +13,80m	26 November 2019	suitable for early use of building
73.	Turbine hall II.HVB floor +32,50m	26 November 2019	suitable for early use of building
74.	Main grounding grid – Part 2	28 November 2019	suitable for early use of building
75.	Tranches and channels of power cables - part 1	28 November 2019	suitable for early use of building
76.	Exterior lighting – Part 2	28 November 2019	suitable for early use of building
77.	Cable channels of main cooling towers II HVB	28 November 2019	suitable for early use of building

On 27 November 2019, an oral hearing was held in connection with the local survey of objects of Unit 3, and within the scope of objects and facilities common to Units 3&4, which are necessary for the operation of Unit 3 in connection with the application for permission for early use of the Mochovce Nuclear Power Plant, WWER 4x440 MW, Project 3. The ÚJD SR notified the parties in writing about the date of the oral hearing connected with local survey – by letters reg. No. 7860/2019, 7864/2019 and 7865/2019 dated 30 October 2019. ÚJD SR published the details of the organization of the local survey in question at its website. The procedural act was attended by the parties, including representatives of Slovenské elektrárne, a. s., GLOBAL 2000 (Austria) NGO, and representatives of local self-government, as well as representatives of the authorities concerned, and ÚJD SR. Engineering and commissioning units of Slovenské elektrárne, a. s. presented the buildings and equipment to those present, which were subsequently the subject of visual inspection following after the oral hearing. During the oral hearing connected with local survey, those present asked questions and made comments, which were answered by the relevant representatives of Slovenské elektrárne, a. s. and of ÚJD SR. The persons present were also given the opportunity to consult the relevant documentation. Minutes and Protocol from the oral hearing and the visual inspection of buildings and equipment within the local survey were drafted, the content of which was agreed between the parties, authorities concerned and others present. The Minutes and the Protocol are published on the website of ÚJD SR.

In carrying out the construction, the general technical requirements for construction were respected. The project is implemented according to the design documentation verified in the building procedure for the modification of the building before completion for Mochovce Nuclear Power Plant WWER 4x440 MW, Project 3, in which ÚJD SR Decision No. 246/2008 of 14 August 2008 was issued and confirmed by the second instance ÚJD SR Decision No. 291/2014 of 23 May 2014. It can be concluded that the early use of the project will not endanger the life and health of persons, nor the interests of society and the environment, therefore ÚJD SR decided as stated in the operative part of this Decision.

Compliance with the binding conditions of ÚJD SR Decision No. 246/2008, confirmed by ÚJD SR Decision No. 291/2014 (permit for modification of the project “Mochovce Nuclear Power Plant WWER 4x440 MW Project 3“ before completion) was part of the documentation for individual oral hearings connected with visual inspections (local surveys). A summary evaluation of the fulfilment of the binding conditions of ÚJD SR Decision No. 246/2008, confirmed by Decision No. 291/2014 was submitted by Slovenské elektrárne, a. s. to ÚJD SR as part of the submission of 12

December 2016, and updated it by letter ref. SE/2019/063998 dated 20 November 2019, which was registered by ÚJD SR as reg. No. 8584/2019.

Slovenské elektrárne, a. s. submitted a letter ref. SE/2019/050765 dated 18 September 2019, to ÚJD SR, which was registered by ÚJD SR under reg. No. 6722/2019 “Final Opinion on the assessment of compliance between DD (Detailed Design) and the concept of BD (basic design)“. Designer’s supervision (ÚJV Řež, a.s., Energoprojekt Praha) in this document notes the compliance of the detailed design with the basic design and its amendments. In individual cases the designer’s supervision requires adjustments to be made in the areas of nuclear, machinery, electrical and I&C, in order to achieve full compliance between the Detailed Design and the Basic Design. These adjustments are most often of a formal nature (modification of the documentation required to be aligned with other changes in legislation).

On the basis of the opinion of designer’s supervision, ÚJD SR asked Slovenské elektrárne, a. s. to update the document “Final opinion on the assessment of compliance between DD (Detailed Design) and the concept of BD (Basic Design)“. Slovenské elektrárne, a. s. by letter re. SE/2020/017471 of 26 March 2020 submitted to ÚJD SR a revised document, “Final opinion on the assessment of compliance between DD (Detailed Design) and the concept of BD (Basic Design), rev. 02., in which the author of the Basic Design notes that after the modifications made to the documentation, the technical documentation of the Detailed Design is in line with the concept of the Basic Design.

By Decision No. OOZPŽ/4603/2019 of 15 October 2019, UVZ SR issued a permit for the release of radioactive substances resulting from the operation of Units 1, 2 and 3 of Mochovce from administrative control by their discharge into the environment. The Decision defines the basic authorized limits for limiting the exposure of residents around the nuclear installation caused by radioactive substances released from administrative control and discharged into the air, and surface waters, in the operation of Units 1, 2 and 3 of Mochovce, a designated computing program for model evaluation of exposure of residents caused by discharges of radioactive substances released from administrative control into the environment during normal operation of Units 1, 2 and 3 of Mochovce, reference levels of radionuclides discharges into the air per calendar year, reference levels of radionuclides discharges in waste water into surface waters of the Hron river per calendar year, requirements for monitoring the activity of radionuclides discharged into the air, the activity of radionuclides discharged in wastewater into the surface water of the Hron river, and other important rules for the release of radioactive substances resulting from the operation of Units 1, 2 and 3 of Mochovce from administrative control by discharging them into the environment.

By letter reg. No. 8862/2019 dated 9 December 2019, the first instance administrative authority requested the Chairperson of ÚJD SR, as the appellate body in compliance with Section 58 par. 1 and Section 61 par. 2 of the Code of Administrative Procedure, in connection with Section 49 par. 2 of the Code of Administrative Procedure, to extend the period for the decision in administrative proceedings Nos. 2.1 and 2.2 by 6 months. The first-instance administrative authority justified its request by the need to perform additional control activities during the reheating of Unit 3, and also to give the parties sufficient time for commenting the supporting documentation used for the decision in accordance with Section 33 par. 2 of the Code of Administrative Procedure. The Chairperson of ÚJD SR complied with the request of the first-instance administrative authority and extended the period for the decision by 6 months. The parties and other authorities concerned were informed about the extended period by letters of ÚJD SR reg. Nos. 9187/2019, 9198/2019 and 9190/2019 dated 19 December 2019.

ÚJD SR By letter reg. No. 161/2020 of 9 January 2020, ÚJD SR submitted to MoEnv SR an update on fulfilment of the Final Opinion on EIA of MO3&4. This update on the fulfilment of the conditions of the Final Opinion on EIA of MO3&4 was drafted by Slovenské elektrárne, a. s. and was sent to ÚJD SR by letter ref. SE/2019/069972 dated 18 December 2019. ÚJD SR inspectors checked

the data in the update during their inspection in Mochovce. The update was requested by ÚJD SR following the issue of ÚVZ SR Decision No. OOPŽ/4603/2019 of 15 October 2019. At the same time as submitting an update on fulfilment of conditions from the Final Opinion on EIA of MO3&4, ÚJD SR requested the MoEnv SR by letter reg. No. 161/2020 to issue a Binding Opinion on the fulfilment of recommended conditions from the Final Opinion on EIA of MO3&4 pursuant to Section 38 par. 4 of Act No. 24/2006 Coll.

As part of the procedure and after reviewing the assessment of the fulfilment of conditions set out in the Final Opinion on EIA of MO3&4 issued pursuant to the Impact Assessment Act, MoEnv issued its Binding Opinion No. 1360/2020/zg (hereinafter only as the "Binding Opinion of MoEnv SR") of 11 February 2020, which was delivered to ÚJD SR on 12 February 2020, and registered as reg. No. 1166/2020 in file No. 781-2020. In the Binding Opinion, the MoEnv SR states that: "...petition for the procedure in the matter of issuing permit for an early use of the project Mochovce Nuclear Power Plant of WWER 4x440 MW Project 3, and permit for early use of individual building objects of Unit 3 and common objects for Units 3&4, which are necessary for the operation of Unit 3, is conceptually in line with the Impact Assessment Act, with the Final Opinion of MoEnv SR No. 395/2010-3.4/hp of 28 April 2010 and its conditions". The Binding Opinion of MoEnv SR contains the following conditions:

- 1) Environmental Impacts Assessment pursuant to Section 17 of ÚJD SR Decree No. 33/2012 on the periodical, comprehensive and systematic nuclear safety assessment of nuclear installation as amended (hereinafter only as "Decree No. 33/2012").
- 2) The overhead power lines shall have a technical solution, which prevents the killing of birds.

ÚJD SR reflected the condition No. 2) from the Binding Opinion of MoEnv SR into the Condition C.2 of the draft decision, which was published for the parties and the public on the ÚJD SR website on 15 February 2020. By publishing the supporting documentation for the decision in the administrative proceedings Nos. 2.1, 2.2 and 2.3, ÚJD SR implemented Section 33 par. 2 of the Code of Administrative Procedure, where the parties are given the opportunity to comment on its supporting documentation and on the way it was determined, or to propose supplements before the decision is issued. Also, by publishing the draft decision, ÚJD SR made it possible to exercise the right of the public, in particular under Art. 6 par. 2 of the Convention on Access to Information, Public Participation in Decision-Making, and Access to Justice in Environmental Matters (Aarhus Convention) (Published in the Collection of Laws by the Notice of the Ministry of Foreign Affairs of the Slovak Republic on the adoption of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters No. 43/2006) (hereinafter referred to as the "Aarhus Convention") as an international treaty, by which the Slovak Republic is bound.

Slovenské elektrárne, a. s. has taken measures to fulfil Condition No. 2) of the Binding Opinion of MoEnv SR in a timely manner. By letter ref. SE/2020/027411 dated 25 May 2020, ÚJD SR informed about implemented measure to ensure that the overhead power lines are designed in a way that prevents the killing of birds. By letter reg. No. 3839/2020 dated 9 June 2020, ÚJD SR requested MoEnv to comment on the measures implemented on the overhead power lines at MO3&4. The MoEnv SR, by letter ref. 1360/2020zg dated 25 June 2020, informed ÚJD SR, that based on measures implemented it considers the condition set out in the Final Opinion on EIA of MO3&4 to be fulfilled. In view of the above, Condition No. 2 of the Binding Opinion of MoEnv SR is not found in this Decision.

Fulfilment of Condition No. 1) from the Binding Opinion of the MoEnv SR can only be verified after Unit 3 has been put into operation/trial run. For this reason, the ÚJD SR will incorporate the wording of this condition into the envisaged future decision on the issue of approval of the trial run of Unit 3. The favourable opinion of the MoEnv SR on such a procedure of ÚJD SR is stated in the written communication contained in file No. 781-2020 under reg. No. 1271/2020.

ÚJD SR verified the performance of the tasks of the Action Plan following the Stress Tests after the Fukushima accident in the form of inspection No. 412/2020, which took place during August and December 2020. With this inspection, ÚJD SR checked on site the data contained in the submitted list of fulfilled tasks from the Action Plan. Slovenské elektrárne, a. s. submitted this list to ÚJD SR by letter No 31 October 2019, which was registered by ÚJD SR under No. 7977/2019. ÚJD SR confirmed after the inspection that measures from the Action Plan following the Stress Tests are fulfilled, or will be fulfilled within the set deadlines. In 2020, during inspection in Mochovce, ÚJD SR requested an update to the fulfilment of tasks from the Action Plan. Slovenské elektrárne, a. s. submitted this update on the Action Plan as part of the documentation for the inspection. ÚJD SR verified by inspection fulfilment of tasks from the Action Plan, based on which it notes that the annual tasks of the Action Plan are fully implemented.

The documentation for the decision in administrative proceedings Nos. 2.1 and 2.2 was published on the ÚJD SR website. The parties and other authorities concerned were informed about publishing of the documentation for the decision in administrative proceedings Nos. 2.1 and 2.2 in writing, by letters reg. No. 5918/2018, 5913/2018 and 5921/2018 dated 17 July 2018. None of the parties commented on the documentation forming the basis for the decision within the set deadline (by 28 October 2018).

By letter No. 1024/2020 dated 10 February 2020, ÚJD SR announced the provisional date of publication of the documentation on the draft decision in administrative proceedings for “Mochovce Nuclear Power Plant of WWER 4x440 MW Project 3“ by means of a public decree, by publishing information on the website of ÚJD SR in Slovak: [https://www.ujd.gov.sk/ujd/www1.nsf/\\$All/58D2014BED8FF4C8C1257F7D002FA95D](https://www.ujd.gov.sk/ujd/www1.nsf/$All/58D2014BED8FF4C8C1257F7D002FA95D)), in English: [https://www.ujd.gov.sk/ujd/WebStore.nsf/viewKey/notification_basis_decision_unit_3/\\$FILE/L_1026_2020_GaPe_web.pdf](https://www.ujd.gov.sk/ujd/WebStore.nsf/viewKey/notification_basis_decision_unit_3/$FILE/L_1026_2020_GaPe_web.pdf)), as well as by delivery of a letter to interested parties in the territory of the Slovak Republic by letter dated 10 February 2020 under No. 1024/2020. Interested parties having their registered office abroad, the announcement on the publication of the supporting documentation for the decision in the administrative proceedings was delivered by letter dated 10 February 2020 under No. 1026/2020 in English.

Documentation for a decision in administrative proceedings Nos. 2.1, 2.2 and 2.3 were published on the ÚJD SR website and on the Central Official Electronic Notice Board of SR on 15 February 2020 as supporting documentation, the publication of which in the administrative proceedings in question implements Section 33 par. 2 of the Code of Administrative Procedure, in which the parties were given opportunity to comment on the basis and the method how it was established before the decision is taken, or to propose any supplements. Also, this draft resolution and its publication made it possible to implement the right of the public, in particular pursuant to Article 6 par. 2 and 3 of Aarhus Convention. The parties were informed about publication of the supporting documentation for the decision in the administrative proceedings Nos. 2.1, 2.2 and 2.3 by letters reg. No. 1027/2020, 1026/2020 and 1024/2020 dated 10 February 2020.

At the same time, ÚJD SR by letters reg. No. 1027/2020, 1026/2020 and 1024/2020 dated 10 February 2020 pointed out to the parties that pursuant to Section 8 par. 10 of the Atomic Act as amended by its last amendment published in the Collection of Laws of the Slovak Republic under No. 279/2019 Coll. in force from 1 October 2019, it will serve all documents, including the decision to issue approval or permit, a call, notification, summons or other document by public decree. ÚJD SR also informed the entities involved that the public decree will be published on the Central Official Electronic Notice Board of SR, on the ÚJD SR website and at the municipal offices in the municipalities of Kalná nad Hronom and Nový Tekov.

The documents included the draft decision issuing a permit pursuant to Section 5 par. 3 (b), Section 5 par. 3 (f) of the Atomic Act, Section 121 par. 2 (e) and Section 83 of the Building Act, with

appropriate explanations for the parties, chapter 13 of PSR of MO3&4 (Environmental Impact) and the account of fulfilled conditions from the Final Opinion on EIA of MO3&4.

ÚJD SR asked the parties and other authorities concerned, in accordance with Section 33 par. 2 of the Code of Administrative Procedure, to comment on the published supporting documentation for the decision in writing no later than 15 April 2020.

By letter reg. No. 3711/2020 dated 2 June 2020 the first-instance administrative authority asked the Chairperson of ÚJD SR as the appellate administrative authority in accordance with Section 58 par. 1 and Section 61 par. 2 of the Code of Administrative Procedure, in connection with Section 49 par. 2 of the Code of Administrative Procedure, to extend the period for decision in administrative proceedings Nos. 2.1, 2.2 and 2.3 by 6 months. The first-instance administrative authority justified its request by the following:

- In connection with the threat to public health by coronavirus COVID – 19, there was a significant slowdown in the pace of completion of Unit 3 between March and May 2020. This has substantially affected some activities, which need to be completed before a decision is issued in administrative proceedings Nos. 2.1, 2.2 and 2.3.
- Unit 3 is undergoing extensive quality control of metallurgical materials, which was triggered by the detection of non-conforming material that was installed on Unit 4. This check must be completed before a decision is issued on the case. At the same time, given the scope, it is reasonable to expect that the completion of this control will exceed the time limit for the issuance of decision in administrative proceedings Nos. 2.1, 2.2 and 2.3.

The ÚJD SR Chairperson complied with the request of the first-instance administrative authority and extended the period for decision by 6 months. The parties and other authorities concerned were informed about the extension of the period for decision by a public decree that is published on the Central Official Electronic Notice Board of SR, on the ÚJD SR website and at the municipal offices of municipalities Kalná nad Hronom and Nový Tekov (letter reg. No. 3913/2020) and on the ÚJD SR website.

The period of two months granted in order to be able to acquaint themselves with the basis for the decision and to exercise the right to comment on, expired on 15 April 2020. As of that deadline set by the administrative authority, the following four entities delivered their position on the draft decision and its basis:

1. MBL spol. s r. o., with its registered office at Táborská 93, 615 00 Brno, Czech Republic, BIC: 26 312 956, incorporated in the Commercial Register of the Regional Court Brno, reg. No.: C43278 (hereinafter only as “MBL”) represented by a lawyer, on 6 April 2020 delivered to the electronic mailbox of the ÚJD SR a statement on the basis for the draft decision, which was registered under No. 2436/2020. The statement delivered by MBL complied with the formal requirements for the submission in accordance with Section 19 par. 1 of the Code of Administrative Procedure.
2. On 15 April 2020, the Office of the Regional Government of Lower Austria delivered a statement to ÚJD SR on the draft decision and its basis in a form of e-mail, which was registered under No. 2607/2020. From a procedural point of view the submission did not comply with the formal requirements under Section 19 par. 1 of the Code of Administrative Procedure.
3. GLOBAL 2000, an NGO, delivered its opinion on the draft decision and its basis on 15 April 2020 by e-mail and ÚJD SR registered it under No. 2608/2020. From a procedural point of view the submission did not comply with the formal requirements under Section 19 par. 1 of the Code of Administrative Procedure.
4. Slovenské elektrárne, a. s., delivered its written position on the draft decision and its basis by letter No. SE/2020/019979 dated 8 April 2020, registered by ÚJD SR under No. 2557/2020.

Both substantive and formal or procedural comments were raised in the statements received. In order to reliably determine the state of affairs, ÚJD SR dealt with the individual statements as follows:

The statement made by the Regional Government of Lower Austria:

- a) Reactors that are currently being put into operation worldwide, belong to the 3rd generation reactors. The Soviet type of WWER 440/213 reactor from the 1960s and 1970s belongs to the 2nd generation. Despite of numerous improvements made to the original design, upgrades and ambitious declarations on “evolutionary concept“, Units 3&4 with WWER 440/213 reactors by no means reach the safety standard of the new, generation 3 installations.
- b) The Stress Tests carried out after the Fukushima accident aimed at preventing severe accidents did not produce sufficient consequences. It lists cases that could also be relevant for Mochovce:
 - 1) Failure of turbines that may cause explosion and fire,
 - 2) Flooding of the joint turbine hall with WWER-440/213 equipment, which may cause loss of power in all four installations,
 - 3) An earthquake, which causes cooling towers to collapse on to the building of adjacent cooling water and thereby disable their last cooling stage on two installations,
 - 4) Plane crash,
 - 5) In the event of severe accidents, it must be ensured that the molten core does not get outside the pressure vessel, otherwise conditions could arise, which are very likely to be unmanageable. In case of the scheduled commissioning of Unit 3, the above measures do not appear to be sufficiently documented.
- c) An obsolete reactor type, the safety level falls short of the latest standard. It provides the following arguments:
 - 1) The reactors are not equipped with a containment, but only a confinement with a pressure suppression system,
 - 2) (WWER Units) are dual-units with a common reactor hall and common turbine hall for all four reactors,
 - 3) (WWER 440/213 reactor) is not equipped for severe accidents beyond the design-basis accidents,
 - 4) The resistance against impact of an aircraft has not been proven,
 - 5) Closure of any molten core in the reactor pressure vessel has not been demonstrated either in all sub-areas or in its entirety, let alone under severe accident conditions.
- d) Aging of building parts and decades-long construction history of the installation:
 - 1) Contractors and construction companies have already carried out maintenance and preservation, but these measures have only been implemented since 2000 under the supervision of the Nuclear Regulatory Authority,
 - 2) The question arises whether safety-relevant parts of equipment and machinery (e.g. emergency power supply diesel unit), for which relevant aging can already be recorded, have undergone extensive testing and documentation of their flawless functioning and whether adequate transparent ageing management system has been put in place to the extent and quality that is necessary,
 - 3) According to the IAEA Pre-OSART Mission (*Operational Safety Review Team*), the quality of construction organization, construction supervision, documentation acceptance, staff training and deficiency management remains unclear for the public and therefore still needs to be critically assessed.
- e) Electrical power – potential electrical gross power of 471 MW is stated per Unit, which is higher than the originally planned power of 440 MW. The question arises, whether the original safety margins for possible higher electric power have been exhausted.
- f) The environmental impacts assessment refers in detail to interim storage facility, while the terminal storage facility continues to refer to the national development program for the

geological repository. It also mentions the possibility of exporting spent nuclear fuel abroad. One way or another, the issue of repository will not be solved even before the scheduled commissioning of Unit 3, and considerations of the relevant part of the environmental impacts are being moved to the future.

The statement by the Office of the Lower Austrian Regional Government that was delivered by electronic means in a form of E-mail did not satisfy the requirements of a filing pursuant to Section 19 par. 1 of the Code of Administrative Procedure. According to this provision, any filing made in electronic form without authorization under a special regulation on electronic form of the exercise of public authority, must be completed within three business days also in paper form, in electronic form it must be authorized under a special regulation or orally in Minutes. The statement by the Office of Lower Austrian Regional Government was a resubmission of a statement from 2009 in German language with a minor update, however, not containing any specific reservations, suggestions, comments on the draft decision and to its supporting documentation.

ÚJD SR instructed the party on the absence of prescribed filing requirements, and in accordance with Section 19 par. 3 of the Code of Administrative Procedure, in response dated 16 April 2020 and registered under No.262/2020 called the party through E-mail, from which the statement was received, to remedy the shortcomings within the prescribed period, i.e. to serve its filing according to the legal requirements relating to electronic filing under a special regulation within 3 business days.

Following a request from ÚJD SR, the Office of the Regional Government of Lower Austria on 18 April 2020, despite the instruction, again delivered the statement electronically by E-mail. The submission again did not comply with the statutory requirements for filing laid down in Section 19 par. 3 of the Code of Administrative Procedure, since it was not supplemented in paper form within three business days nor authorized pursuant to special regulation on electronic form of exercise of official authority, nor confirmed orally into Minutes according to Section 19 par. 1 of the Code of Administrative Procedure. In the re-sent electronic submission, the statement compared to the original submission was only updated with the date and a change in the person of the responsible representative representing the Office of the Regional Government of Lower Austria.

ÚJD SR had the statement of the Office of the Regional Government of Lower Austria translated, and reviewed the submission in accordance with Section 19 par. 2 of the Code of Administrative Procedure as to its contents, despite the failure to follow the correct procedure for making electronic submissions by the party, to which the administrative authority pointed out for the party by call and instruction on the need to supplement such submission by e-mail of 16 April 2020.

In its statement, the Office of the Regional Government of Lower Austria expressed a general negative attitude towards the expansion in use of nuclear energy as such, which would be the commissioning of Unit 3 in that regard. The various points of the statement focused on the technical condition of the facilities and components of Unit 3.

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The statement made by GLOBAL 2000 on the draft decision for the commissioning of Unit 3 of MO 3&4 includes the following:

- a) GLOBAL 2000 considers it non-standard that the ÚJD SR publishes the documentation for the draft decision, which did not take the form of final decision. GLOBAL 2000 further objected to the formulation of conditions with explanatory notes for the applicant for permit, which it considers to be a room for further negotiations between the applicant and the ÚJD SR.
- b) As for the formulation of conditions with explanatory notes, GLOBAL 2000 disagreed with the wording of the conditions, in particular with regard to their conditional formulation, because of the impossibility of the public participation in the decision-making process due to the fact that at the time of publication of the documentation used as a basis for the draft decision did not include evidence on the readiness of the objects and facilities for the operation of Unit 3, confirming the readiness of these facilities for its physical and energy start-up stages, due to the ongoing tests and modifications.
- c) GLOBAL 2000 stated that it was not possible at that stage of publication of the documentation for the draft decision, to exercise the right of the public to participate in the decision-making process, and for that reason, proposed to review the draft decision only at the time when all the necessary facilities and systems necessary for operation of Unit 3 were ready. The procedure set out in explanatory note No. 3 to 9.r) excludes public access to information and public participation in the decision-making process.
- d) GLOBAL 2000 also pointed at its previous statements, which according to its opinion have not been taken into account until now:
 - 1) As resulting from the comments on PNM34481619 (Evaluation of the fulfilment of the recommended conditions of MoEnv SR set out in the Final Opinion on EIA), sent by GLOBAL 2000 to the ÚJD SR, the public does not have information on Mochovce NPP and how it differs from the older type of power stations, and how it meets the current safety requirements for mitigating the impact of operation and severe accidents on the environment.
 - 2) Condition 1 of the Final Opinion on EIA MO3&4 states: “The applicant decided to make modifications to selected installations affecting nuclear safety on the basis of amended legislative requirements in force at the time of scheduled completion of Units 3&4 of Mochovce NPP“, which requires full compliance with the legislative conditions in force at the time of power plant completion. This is not met, as this would also include the impact of a large commercial aircraft.
- e) In its statement, GLOBAL 2000 further commented on two other documents supporting the draft decision, the Evaluation of the method of fulfilment of the recommended conditions set out in the Final Opinion on EIA MO3&4 (“Evaluation of the method of fulfilment of the conditions“) of 12 December 2019, and Chapter 13 of PSR MO3&4 concerning environmental impacts of 14 September 2018. According to GLOBAL 2000, this is a failure to provide precise and specific information on how condition 3.4 of the Final Opinion on EIA MO3&4 was met, which reflects the requirements of the European Commission (development of a reference deterministic scenario for external source, e.g. impact of an aircraft, in line with the best international practice). The account of fulfilment of the requirements from the Final Opinion on EIA MO3&4 only indicates that the tests and analyses have been carried out and the safety has been proven. However, since this information is classified in SR as sensitive information, the details were not made available to the public.
- f) In connection with Condition 1 of the Final Opinion on EIA MO3&4, GLOBAL 2000 takes the view that the statutory conditions laid down in Decision No. 266/2008 require that the legal requirements at the time of completion of the nuclear installations be met, given that in such a case they would also include requirements for resistance to the impact of large commercial aircraft. In addition, GLOBAL 2000 added that the current state of Units 3&4

meets the IAEA and WENRA requirements: *Safety Reference Level for Existing Reactors*, but does not meet the requirements of *Safety Objectives for New Power Reactors*. In the opinion of GLOBAL 2000, this is impaired by the ageing of buildings, structures and components from the start of construction period in the 1980s, as well as by the extremely poor quality of construction management, which in addition to WANO, was confirmed by several whistle-blowers and allegedly also by the ÚJD SR.

- g) In 2018, GLOBAL 2000 highlighted the lack of scenario dealing with water temperature in the River Hron, which is required by the conclusions of the Final Opinion on EIA MO3&4. The data presented are from 1982, instead of providing a forecast for the next 60 years.
- h) Tables with discharges included in the PSR, Chapter 13, cannot be used for the following reasons:
 - 1) Those values are averages for 4 years from 1999-2002, including EBO1&2, which were shut-down in 2000. This data is more than 20 years old. It would be better to use new data.
 - 2) Why are limit values so high, when they are only down to a few per cent?
 - 3) Why are the values for EMO1&2 higher than for EBO3&4 (tritium into the hydrosphere)?
 - 4) Permitted values for MO3&4 appear to be simply 50% of the values specified in 1997 for 4 Units.
 - 5) Chapter 13.1.4 of PSR contains misleading information based on which, someone reading this chapter may not realise that tritium is discharged with water and thus uses almost the entire permitted amount.
 - 6) As in 2018, the public has not information on bilateral seminars (Condition 3.2 of the Final Opinion on EIA MO3&4).
- i) Statement of GLOBAL 2000 concerning nuclear liability insurance pursuant to Act No. 54/2015 Coll. in respect of which Global states that the amount of EUR 300 million provided for the law, does falls short of the amount of coverage necessary in the event of a large-scale nuclear incident. For comparison, GLOBAL 2000 mentioned calculations by the French IRSN (*Technical Support Organisation*) for a potential nuclear incident in Europe, the damage of which would amount to approximately EURO 400 billion (Source: www.nucnet.org/news/nuclear-accident-in-france-could-cost-more-than-eur-400-billion-says-irsn).
- j) The comment concerning the communication policy of the ÚJD SR, in respect of which GLOBAL 2000 pointed at the fact that ÚJD SR in *Answers to questions on National Report of the Slovak Republic* confirmed compliance with the requirements laid down by the Aarhus Convention. GLOBAL 2000 stated that ÚJD SR provides the IAEA false information on public information in accordance with the Aarhus Convention. In that matter GLOBAL 2000 added that ÚJD SR informs about compliance with the requirements arising from the Aarhus Convention despite of the fact that the Aarhus Convention Compliance Committee (hereinafter referred to as the “Compliance Committee“) has already found a number of violations.
- k) GLOBAL 2000 requests that the ÚJD SR should not grant permit for the commissioning of Unit 3.

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The statement made by MBL, represented by their lawyer, states the following facts:

In its statement regarding the basis for the decision, MBL followed up the communication with the ÚJD SR regarding request for access to information (hereinafter only as the „info request“) pursuant to Act No. 211/2000 Coll. on free access to information and on amendments to certain laws (Freedom of Information Act) as amended. The comments on the supporting documentation for the decision concerned four areas.

In its statement MBL states that it is the contractor of the applicant – Slovenské elektrárne, a. s., and it performed part of the work on seismic reinforcement of Unit 3, and is therefore also the author of the relevant documentation on the work done. In that regard, MBL followed in its statement that this documentation was subject to the right of retention to secure account receivable established by the Notice on exercising the right of retention of 18 June 2018 under ref. MS/094/2018, which was attached to the statement. The first comment concerned the originality of the documentation for the work of seismic reinforcement of Unit 3 and/or Unit 4 of the Mochovce NPP. MBL, pointed at the responses of ÚJD SR that were subject of info requests from 30 July 2019 and 11 March 2020. In that matter, the ÚJD SR provided information that “For the final building approval decision it is necessary to submit original documentation, or where appropriate notarized copies conforming to the original, not to the copy submitted to the notary public for verification.“ Following the response of the ÚJD SR, MBL raised doubts that in the context of final building approval procedure, the originals or certified copies of the documentation for the work of seismic reinforcement were not submitted to the ÚJD SR. It was also stated in that regard that the applicant does not hold originals of the required documentation in the administrative procedure, since this documentation is subject to a right of retention based on the Contract on Work made between MBL and Solesi S.p.A.

- A. The second comment concerned the existence of a right of retention on documentation, which according to MBL, should not have been in the applicant’s right of disposal or Solesi S.p.A. In the context of the second comment, it was reiterated that the documentation submitted by the applicant to the ÚJD SR in the final building approval procedure, is not the original.
- B. According to the statement of MBL, Slovenské elektrárne, a. s. can demonstrate compliance with the condition of seismic reinforcement of Unit 3 only if it submits all seismic reinforcement documentation to the ÚJD SR in originals or copies certified by a Notary.
- C. In its statement, MBL strictly requested ÚJD SR to take steps to establish the authenticity and completeness of the documentation submitted by Slovenské elektrárne, a. s.

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In its statement on the draft decision, Slovenské elektrárne, a. s. proposed amendment to the text of condition C.1:

- 1) Change of reference – instead of Section 78 par. 1, make reference to Section 144a of the Building Act.
- 2) Correct the error in par. 1, p. 28/xx text: „...which must not be exceeded“.

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The company MBL spol. s. r. o. with the registered seat at Táborská 93, 615 00 Brno, Czech Republic BIC: 26 312 958, registration: Commercial Register of the District Court Brno, reg. number C43278 (hereon after MBL) represented by attorney, delivered on 20 October 2020 into ÚJD SR electronic mailbox position and comments on the basis for issuing the authorization for operation of Nuclear Power Plant Mochovce Unit 3 decision draft, which was registered under the no. 7274/2020. The submitted position of MBL fulfils all formal requirements of submission in accordance with Section 19 (1) of the Code of Administrative Procedure.

In its position MBL spol. s. r. o. states, that it has elaborated documentation on the welds that were performed by certified professional welders of MBL spol. s. r. o. as well as the documentation necessary to hand over individual elements. MBL spol. s. r. o. further on states, in its position, that as the contractor of the mentioned work and therefor the author of the documentation in question, it has the only original of the mentioned documentation in its possession due to exercising the retention right, whereas Slovenské elektrárne, a. s. as well as Solesí S. p. A. do not have a copy of this documentation. With reference to Decree No. 430/2011 Coll. (Annex 4 Part B (I)(A) par. 5, 7). MBL spol. s. r. o. states that the requirements for seismic reinforcement of Mochovce Unit 3 can be demonstrated by Slovenské elektrárne, a. s. only under the condition that the original version or notarised copy of the documentation related to seismic reinforcement of Unit 3, including documentation on welds, is submitted to ÚJD SR.

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Documentation used as a basis for the Decision in administrative proceedings Nos. 2.1, 2.2 and 2.3 was published again on the website of ÚJD SR, and on the Central Official Electronic Notice Board of SR as documentation, the publication of which, in the administrative proceedings in question, implements Section 33 par. 2 of the Code of Administrative Procedure, in which the parties were given the opportunity to comment on its basis and the method of establishing it or to propose its supplement, before issuing the decision. ÚJD SR published the documentation for the decision repeatedly, considering the following circumstances:

- Statement made by GLOBAL 2000 on the publication of the supporting documentation for the decision of 15 February 2020,
- Relatively large time lag between the publication of documentation used as a basis for the decision of 15 February 2020, and the possible date for the date of issue of the Decision in terms of compliance with all technical requirements by Slovenské elektrárne, a. s. The delay in meeting the technical conditions for issuing the Decision itself was caused by the measures against the spread of COVID-19 in the Slovak Republic, and their application in Slovenské elektrárne, a. s., and the related slow-down in the pace of completion work on Unit 3, as well as the need to carry out extensive additional inspections of the materials used at Unit 3.
- Taking into account the nature of activity that is the subject of the authorization proceeding, the involvement of home and foreign public in decision-making process as well as the impact

of epidemic situation on fulfilment of the decision condition by the applicant for authorization, ÚJD SR is of the opinion that the involved parties should have the opportunity to again familiarize with the current state of requirements fulfilment for issuing a decision in the above mentioned administrative proceedings.

Additional basis for the decision was published as follows:

- POSAR MO3&4 of 2 November 2020. Administrative proceedings participants as well as involved parties were informed about the publication of POSAR MO3&4 on the ÚJD SR website, by public notice, that was published on Central Official Electronic Board of the Slovak Republic, on Town Halls of the towns Kalná and Hronom a Nový Tekov (letter ref. no. 7507/2020) and on ÚJD SR website.
- Draft decision in the case of application of Slovenské elektrárne, a. s. for the issue of permits in the administrative proceedings Nos. 2.1, 2.2 and 2.3 of 22. 01. 2021. Administrative proceedings participants as well as involved parties were informed about the publication of decision draft on the ÚJD SR website, by public notice, that was published on Central Official Electronic Board of the Slovak Republic, on Town Halls of the towns Kalná and Hronom a Nový Tekov (letter ref. no. 432/2021) and on ÚJD SR website.

The publication of PSR MO3&4 and the draft decision allowed the exercise of the right of the public, in particular under Art. 6 Section 2 and 3 of the Aarhus Convention. The parties were informed about the publication of the supporting documentation for the decision in administrative proceedings Nos. 2.1, 2.2 and 2.3 by public decree in accordance with Section 19 par. xx of the law.

First-degree administrative body has asked by letter ref. no. 8389/2020 of 3 December 2020 the chairperson of ÚJD SR as the appellate administrative body pursuant to par. 58 (1) and par. 61 (2) of the Code of Administrative Procedure, in relation to Section 49 (2) of the Code of Administrative Procedure, to extend the period for decision in administrative proceedings no. 2.1, 2.2 and 2.3 by 6 months. First-degree administrative body justified its request by ongoing extensive inspection of material quality (pipeline components) that were used on Mochovce Unit 3. This inspection is performed by Slovenské elektrárne, a. s. and its contractors. The process of evaluation and interpretation of the inspection results is extremely time consuming and professionally demanding and is not expected to be completed before the period for issuing a decision in the matter has passed. Quality inspection of the used materials (pipeline components) on Unit 3 including its detailed evaluation must be performed/completed before issuing a decision in the matter. Demonstration of required quality of materials (pipeline components) in accordance with valid standards and technical requirements has extreme importance from the point of view of future safe commissioning and operation of Mochovce Unit 3.

The Chairperson of ÚJD SR complied with the request of the first-degree administrative body and extended the period for decision by 6 months. Administrative proceedings participants as well as involved parties were informed about the publication of decision draft on the ÚJD SR website, by public notice, that was published on Central Official Electronic Board of the Slovak Republic, on Town Halls of the towns Kalná and Hronom a Nový Tekov (letter ref. no. 8741/2020) and on ÚJD SR website.

Slovenské elektrárne, a. s. submitted to ÚJD SR by the letter ref. SE/2021/002201 of 18 January 2021 information about elaboration of new revision of the document Final Report of Unit 3. The Final Report of Unit 3 documents the readiness of Unit 3 – equipment, personnel and documentation for the commissioning. The Final Report of Unit 3 evaluates the test results of equipment and systems in conditions of inactive testing, provides an evaluation of meeting the success criteria of individual tests, Protocol numbers documenting the fulfilment of success criteria of inactive tests, punch list with the deadlines for their removal, the reason for their persistence, and also proof that they do not affect nuclear safety either individually or in their cumulative effect. The vast majority of registered punch list items are of a record nature and relate to the fact that the work on Unit 4 has not been completed yet. The Final Report of Unit 3 documents the state of readiness of the personnel for commissioning of Unit 3, and the readiness of operational documentation for the commissioning.

ÚJD SR has performed, using the form of an inspection in Mochovce, continues evaluation of previous revisions of Final Report of Unit 3, performed evaluation of changes in the current revision of Final Report of Unit 3 in comparison with previous revisions and states that the Final Report of Unit 3 is in compliance with the requirements of Decree No. 430/2011, listed in its Annex 4 part B (I) (A) par. 5, 7, 9, (G) par. 1, 2 and in Section 7 par. 2 (b), (c) of the Atomic Act.

Slovenské elektrárne, a. s. submitted to ÚJD SR the Final Report on the evaluation of materials/metallurgical components used in Unit 3. This Report states that the methodology accepted by ÚJD SR was followed in verifying the quality of metallurgical components. Overall, 2960 metallurgical components were checked. There were 52 cases of material exchange and 288 cases of deviations from the standard (hereinafter referred to as "deviations"). All detected deviations were duly assessed, including laboratory determination of their chemical composition and laboratory determination of their mechanical properties in accordance with the accepted methodology. Eight metallurgical components had to be replaced due to the unsatisfactory chemical composition or unsatisfactory mechanical properties. Testing of chemical composition and mechanical properties in the laboratory were performed so that their results meet the requirements of Section 8 of Decree No. 431/2011.

The other documentation includes the individual types of documentation mentioned in the reasoning of this Decision. They constitute partial approval or review procedures that have been carried out separately or in parallel with the proceedings for the issue of this Decision.

The administrative fee was not levied because the administrative procedure conducted under the Atomic Act is not subject to a fee obligation under Act No. 145/1995 Coll. on Administrative Fees, as amended.

On the basis of the above, the ÚJD SR decided, as stated in the operative part of this Decision.

Advice of remedies

Pursuant to Section 61 par. 1 of the Code of Administrative Procedure, an appeal can be filed against this Decision at ÚJD SR, Okružná 5, 918 64 Trnava, within 15 days from the date of service of this Decision. An appeal filed on time has a suspensory effect.

After the exhaustion of the admissible ordinary remedy, this Decision can be reviewed by the administrative court in accordance with the provisions of Act No. 162/2015 Coll., Administrative Judicial Code, as amended.

In Trnava.....2021

Director General
Safety Assessment and Inspections