

RE: Request for prolongation of deadline for comments and proposals – delivery

The Nuclear Regulatory Authority of the Slovak Republic obtained your request No. WUA 44578-2019 for prolongation of the deadline for comments and proposals to the Draft of the second stage decision referring to the fresh fuel node in the nuclear installation Nuclear Power Plant Mochovce 3&4 on 28th March 2019.

The Chairperson of the Nuclear Regulatory Authority of the Slovak Republic as the second stage administrative decision body is examining the first stage decision of the Nuclear Regulatory Authority of the Slovak Republic No. 277/2018 of 29th October 2018 (ID No. 6874/2018), which was challenged by GLOBAL 2000 – Friends of the Earth – as the only one of involved subjects. After the examination of the whole administrative process as well as grounds of the case, leading the association GLOBAL 2000 – Friends of the Earth to the submission of this appeal – the Chairperson of the Nuclear Regulatory Authority of the Slovak Republic was advised by the special administrative decision commission. The Draft of elaborated decision was forwarded to all involved participants in order to provide them with the possibility to express their comments and proposals to the grounds of this Draft and to the method of their processing as per par. (33) of the Administrative Procedure Code of the Slovak Republic.

On 22nd February 2019 the Draft of the Decision was forwarded to all involved participants, in order to provide them with the possibility to express their comments and proposals. In order to accommodate the needs of non-Slovak speaking subjects, we did elaborate, beside the version in Slovak language as well the English version of the Draft of the Decision and both were published immediately on our web site. Despite to the standard administrative deadline for delivery of written documents bring 1-2 weeks, the deadline for delivery of documents was stipulated by the Chairperson of the Nuclear Regulatory Authority of the Slovak Republic as 30 working days – which can be considered as above the usual standard for submission.

In practical terms the Wiener Umweltanwaltschaft did confirm the delivery on 26th February which means that its deadline for comments/proposals will expire on 9th April 2019.

According to the opinion of the Chairperson of the Nuclear Regulatory Authority of the Slovak Republic the 30 working days is sufficient time for expression of comments/suggestions given the fact that if the Wiener Umweltanwaltschaft, after due consideration and the edification provided within the decision, did not used it's right to appeal – the current Draft of the Decision is the confirmation of the original Decision issued.

If we would accept the request of the Wiener Umweltanwaltschaft, in accordance with the anti-discrimination principle we would have to prolongate the deadline also for all other involved participants of the process, which would result in further prolongation of all decision making process, which is not acceptable.

Based on above mentioned facts it is not possible to accept your request for prolongation of the deadline for submission of comments and suggestions.

Sincerely yours,

Ing. Marta Žiaková, CSc.

Chairperson