



**Association of
Environmental
Law**

of Central/Eastern Europe and Newly Independent States
(GUTA Association)

A risk mitigation model for combat zone nuclear facility security

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I. Fundamental safety principles cannot be fulfilled under military circumstances



II. The risk of a nuclear catastrophe is underappreciated

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Analysis IAEA SSR-2.2 (Rev. 1) Safety of Nuclear Power Plants: Commissioning and Operation

The occupation of ZNPP made impossible to comply with requirements:

- Requirement 1 (3.2, c, d, e)
- Requirement 2 (3.5, 3.6, 3.7)
- Requirement 4 (3.12, 3.13)
- Requirement 6 (4.13)
- Requirement 7 (4.19, 4.20, 4.24)
- Requirement 9 (4.35)
- Requirement 11
- Requirement 14
- Requirement 17
- Requirement 18 (5.2, 5.7)
- Requirement 21 (5.20)
- Requirement 22 (5.21)
- Requirement 30 (7.23)



Nowhere in the world is the threat of an attack by invading military forces against a power reactor included in the design basis against which a plant must defend to be licensed for operation, following IAEA guidance



The IAEA requires that the highest safety *reasonably achievable* is practised over the *entire operating lifetime* of a nuclear power plant

(Specific Safety Requirements SSR-2/1 (Rev. 1), IAEA 2016)

Brussels bombings: Terror group 'were planning to attack nuclear power station', surveillance suggests

Ibrahim and Khalid el-Bakraoui reportedly spied on Belgian nuclear power chief's home

Caroline Mortimer •

•  Comments



NUCLEAR

French nuclear plants vulnerable to terror attacks, experts say

International experts warned on Tuesday about security shortcomings at French and Belgian nuclear plants that make them vulnerable to attack, in a worrying new report commissioned by the Greenpeace group.

Published: 10 October 2017 15:36 CEST



NUCLEAR

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The IAEA has

- supported the global dumping of nuclear waste into the world's oceans since 1957
- dismisses the concerns of the UN Special Rapporteur on the implications for human rights of the environmentally sound management of disposal of hazardous wastes
- aggressively promotes the false claim that atomic energy can make a significant contribution to climate change alleviation/ is reliable in the face of extreme flooding and drought
- no transparency policy on paper, no policy for to A2I or appeal mechanisms, and no policy nor standard processes for public participation inside the organisation

Article III Functions

1. To encourage and assist [in the] development & practical application of, atomic energy [...] & *if requested to do so*, to act as an intermediary for the purposes of securing the performance of services [...] to perform any operation or service useful in [the] development or practical application of atomic energy [..] [emphasis mine]
(IAEA Statues, 1957)

Article III Functions

6. To establish or adopt [...] standards of safety for protection of health & minimization of danger to life & property [...] & to provide for the application of these standards, *at the request of the parties*, to operations [...] or, *at the request of a State*, to any of that State's activities in the field of atomic energy (IAEA Statutes, 1957)

Mobilization priorities

- Financial support mechanisms for **transnational CS collaboration**
- **Independent needs assessment** to identify what modalities would ensure effective opportunities to secure information & participate in decision-making under the Aarhus Convention
- IAEA monitoring function formally **separated from statutory mandate** to promote the nuclear industry
- Lobbying MS governments to take steps to increase **transparency** of the IAEA and its **participation** modalities
- Efforts to **integrate citizen science** approaches into official monitoring mechanisms

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