

Information Circular

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General Distribution

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Communication dated 18 May 2023 received from the Permanent Mission of Ukraine to the Agency

1. The Secretariat has received a Note Verbale dated 18 May 2023 from the Permanent Mission of Ukraine to the Agency.
2. As requested, the Note Verbale and its attachment are herewith circulated for the information of all Member States.



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The Permanent Mission of Ukraine to the International Organizations in Vienna presents its compliments to the Secretariat of the International Atomic Energy Agency and has the honour to communicate the document “Preliminary Analysis of the Russia’s Illegal Actions at the Zaporizhzhia NPP and Their Consequences”, prepared by the competent authorities of Ukraine.

The Permanent Mission of Ukraine requests the Secretariat of the International Atomic Energy Agency to promptly circulate this Note Verbale and its enclosure as Information Circular to all IAEA Member States.

The Permanent Mission of Ukraine to the International Organizations in Vienna avails itself of this opportunity to renew to the International Atomic Energy Agency the assurances of its highest consideration. *ya*

Encl.: on 5 pages.



Vienna, 18 May 2023

Secretariat
International Atomic Energy Agency

Vienna

Preliminary analysis of the Russia’s illegal actions at the Zaporizhzhia NPP and their consequences

№	IAEA Pillars on Nuclear Safety and Security based on the Agency’s Standards ¹	Russia’s illegal actions	Potential consequences
Pillar 1	The physical integrity of nuclear installations must be maintained whether it is the reactors, fuel ponds, or radioactive waste stores.	<p>Forcible capture, mining of the perimeter and shelling of the ZNPP site and the adjacent territories, which has led to the violation of the physical integrity of the ZNPP and serious damage to the plant and its facilities, create a direct threat to life and health of the operating personnel.</p> <p>Unauthorized structures at the plant site, in particular construction of “walls” near the SNF dry storage.</p> <p>Possible dismantle and removal of FSS-1 and FSS-2 (full-scale simulator) from the ZNPP outside the uncontrolled territory of Ukraine.</p>	<p>Russia’s shelling continues to pose a constant threat to the physical integrity of facilities at the ZNPP.</p> <p>This has substantive implications for the day-to-day operations of the plant and could lead to a nuclear incident or accident.</p> <p>The construction of any structures contrary to the design, approved and implemented in accordance with the requirements of Ukrainian legislation, is an uncontrolled illegal interference by Russia in the design of the ZNPP nuclear installation. Such actions constitute a gross violation of the license for operation of the plant, as well as international requirements, in particular in the context of the implementation of the Agreement between Ukraine and the IAEA for the Application of Safeguards in</p>

¹ SF-1: Fundamental Safety Principles; NSS-20: Objective and Essential Elements of a State’s Nuclear Security Regime; NSS 35-G: Security during the Lifetime of a Nuclear Facility; NSS 27-G: Physical Protection of Nuclear Material and Nuclear Facilities (Implementation of INFCIRC/225/Revision 5); GSR Part 1 (Rev. 1): Governmental, Legal and Regulatory Framework for Safety; GSR Part 2: Leadership and Management for Safety; GSR Part 3: Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards; GSR Part 4 (Rev. 1): Safety Assessment for Facilities and Activities; GSR Part 5: Predisposal Management of Radioactive Waste; GSR Part 7: Preparedness and Response for a Nuclear or Radiological Emergency; SSR-2/1 (Rev. 1): Safety of Nuclear Power Plants: Design; SSR-2/2 (Rev. 1): Safety of Nuclear Power Plants: Commissioning and Operation; NSS-13: Nuclear Security Recommendations on Physical Protection of Nuclear Material and Nuclear Facilities (INFCIRC/225/Revision 5); SSG-53: Design of the Reactor Containment and Associated Systems for Nuclear Power Plants; SSG-63: Design of Fuel Handling and Storage Systems for Nuclear Power Plants; NS-G-2.14: Conduct of Operations at Nuclear Power Plants; SSG-15 (Rev. 1): Storage of Spent Nuclear Fuel; WS-G-6.1: Storage of Radioactive Waste; RS-G-1.8: Environmental and Source Monitoring for Purposes of Radiation Protection.

			Connection with the Treaty on the Non-Proliferation of Nuclear Weapons.
Pillar 2	All safety and security systems and equipment must be fully functional at all times	Unauthorized change of the status of nuclear installations.	<p>The presence of russian troops, military equipment and weapons, as well as russian shelling, can damage critical systems and equipment of the ZNPP and lead to radiological consequences on the site and beyond.</p> <p>By placing its military equipment, ammunition and explosives in the turbine buildings of the ZNPP russia violates fire, nuclear and radiation safety requirements. This significantly increases the risk of fire, which can occur due to the detonation of the ammunition. In addition, russian military equipment make it impossible for specialized fire vehicles and other machines to access the turbine buildings of the ZNPP.</p> <p>Ukrainian operational personnel make significant efforts to maintain the operation of nuclear safety and security systems under constant pressure from the russian military.</p>
		Damage to safety important systems such as mobile feed water pumps for steam generators and the nitrogen-oxygen plant.	
		Attacks on energy facilities, in particular power lines, the damage of which directly affects the safe operation of Ukrainian NPPs.	
		<p>Use of the ZNPP for military purposes:</p> <p>1) power units do not produce electricity for the needs of the population;</p> <p>2) russia placed on the ZNPP site:</p> <ul style="list-style-type: none"> • 50 units of heavy equipment (tanks, armored personnel carriers, etc.); • about 500 soldiers; • equipment, ammunition, and explosives are located in the turbine buildings of units № 1, 2, and 4 of the ZNPP; <p>3) IAEA experts are not allowed in the turbine buildings of the ZNPP, where russian military equipment is located;</p> <p>4) russia announced the permanent presence of representatives of Rostekhnadzor at the ZNPP.</p>	
		Blocked access for the IAEA experts to important facilities, such as the on-site crisis center and the central alarm station.	

		Occupants store many chemical products near transformers, which poses an increased risk of fire.	<p>The interference of representatives of Rosatom and Rosenergoatom in the management process of the ZNPP can lead to uncoordinated actions of personnel, human errors and, as a result, a nuclear accident.</p> <p>Dangerous fluctuations in the power grid and constant loss of external power supply due to russian shelling lead to emergency shutdowns of the plant and create the risk of a nuclear accident.</p>
		Possible attempts by russia to replace Westinghouse nuclear fuel.	
		Intervention in the technological process of operation and management of the ZNPP.	
Pillar 3	The operating staff must be able to fulfil their safety and security duties with a proper rotation and have the capacity to make decisions free of undue pressure.	<p>Blocked access to the plant site for 1,500 highly qualified Ukrainian workers and attempts to replace them.</p> <p>Measures aimed at appropriating the Zaporizhzhia NPP and other property needed for its operation:</p> <ol style="list-style-type: none"> 1) decree of the president of the russian federation No. 711 dated 5 October 2022 on the appropriation of Zaporizhzhia NPP; 2) creation of fake enterprises: FSUE “Zaporozhskaya NPP” and JSC “Operating Organization of Zaporozhskaya NPP”; 3) permanent presence of representatives of Rosatom and Rostekhnadzor; 4) constant psychological and physical pressure on the plant’s staff, forcing them to sign contracts with Rosatom; 5) non-admission of licensed managers to the plant. 	A significant reduction in the licensed and qualified personnel of the ZNPP, an increase in the workload of personnel, as well as attempts to replace them with russian specialists, who do not have the proper training and licenses, pose a direct threat to the safe operation of the ZNPP, can lead to human errors and, accordingly, to a nuclear incident or accident.