

Comments with regard to EPZ PSR-LTO2

Thank you for allowing me to comment on this document.

As a resident of the municipality of Borsele, it is in my interest that a thorough evaluation precedes any lifetime extension of the Borssele nuclear power plant (NPP).

I have the following concerns:

- The document is supposed to be in English but it includes numerous charts and tables in Dutch, even the watermark (Ter Consulatie) is in Dutch. This is a source of future confusion and misinterpretation. NPP Borssele with its history of German documentation should adhere to strict guidelines with regard to (future) documentation. An English editor would not be amiss to weed out sentences like: "This document is composed by four chapters ..".
- The term Periodic in PSR seems to be a misnomer as on page 10 it states: "is a 'one-time safety assessment'"
- It is highly confusing that EPZ has written and submitted this document to the ANVS. Does EPZ hereby dictate the rules by which ANVS is allowed to impose licensing conditions?
- In section 2.1 it is mentioned that the 10EVA23 was completed in 2023. This is not true. EPZ finalized the 10EVA23 in 2025. It was unavailable during the review process of the cNRD for the extension in 2024. These kinds of errors should have been filtered out before putting the document up for review.
- In section 2.2.2 the scope mentions that the Safety Demonstration is added to the PSR to make it compliant with IAEA requirements, then why is it excluded from review?
- In section 2.2.3 the extension time frame is set to 2053, wouldn't a 10 year extension better match with the 10EVA cycle?
- In section 2.4 the OSART (2023/2025) mission is mentioned. However the results, although promised, have not been published by ANVS.
- In section 2.5 current compliance is reported against outdated safety standards. This does not seem relevant.
- In section 3.3: "The review of the Safety Factors should cover a period up to the end of planned operation". Does this include the dismantling of the plant and the long-term storage of the spent fuel?
- Section 3.1.2 includes the weighing of the different safety factors. To me the Safety Performance record would be the best predictor of future safety. Then why is its weight low? Other weights also seem out of order, such as the low regard for procedures. This does not make sense.

- In section 3.1.3: "from other reactors of similar age, design and situation with regard to subsequent lifetime extension" seems to forget that NPP Borssele has become quite unique.
- In section 4.2 the SALTO is planned for 2030 and its follow-up is scheduled after 2034. Which would seem to indicate that the SALTO will not affect the license to operate beyond 2033. This conflicts with earlier statements by KGG. That the FID to extend operations is taken in 2030 means that there is very little time to make the necessary changes before 2033 and also that there are no funds to address any findings raised by the SALTO.