

Information Circular

INFCIRC/1126

Date: 1 September 2023

General Distribution

Original: English

Communication from the Permanent Mission of Ukraine to the Agency

1. On 31 August 2023, the Secretariat received a Note Verbale from the Permanent Mission of Ukraine to the Agency.
2. As requested, the Note Verbale is 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 following.

The situation at the Zaporizhzhia Nuclear Power Plant (ZNPP) is deteriorating further in view of complete disregard by the Russian occupying forces for the nuclear safety and security requirements at the Plant.

With reference to the IAEA's Seven Indispensable Pillars of Safety and Security, the Permanent Mission of Ukraine draws attention of the Secretariat and the IAEA Member States to the following alarming problems at the Zaporizhzhia NPP.

Physical integrity (pillar 1):

Numerous evidences, including satellite imagery, reveal that the Russian military integrated ZNPP actual reactor buildings in its tactical defence planning.

In particular, Russian troops set up combat positions on the roofs of several of the six reactor buildings of the ZNPP. Also, as confirmed by the ISAMZ, mines were placed inside and outside the perimeter of the ZNPP.

In addition to the above, as the Director General has repeatedly reported, the ISAMZ confirmed the placement of military trucks with undefined cargo in the turbine halls of units Nos. 1, 2, and 4. The Russian occupying forces deliberately ignore calls to withdraw the trucks.

Moreover, to maintain secrecy, all trucks are tightly covered, raising concerns about possible transportation of ammunition and explosives.

The Russian occupying forces continue to implement undefined unauthorized modifications to the physical protection system of the Plant's dry spent fuel storage facility, putting it to greater nuclear security risks.

Secretariat
International Atomic Energy Agency
Vienna

The above-mentioned actions by the Russian Federation significantly increase the risks of damage to the safety and security systems of the ZNPP as well as threats to its personnel.

Safety and security systems and equipment (pillar 2):

Unauthorized Russian personnel at the occupied ZNPP successively disable units of the Plant by implementing technically unfounded and, as a result, destructive measures.

In particular, unauthorised transfer of the modes of the ZNPP units led to numerous damages to the steam generators and significantly increased the risk of release of radioactive isotopes.

Such measures are in non-compliance with the IAEA safety standards as well as remain contrary to regulative orders of the national regulator of Ukraine – State Nuclear Regulatory Inspectorate.

As the Director General confirmed in his reports on this matter, the maintenance performed on all ZNPP reactor units since the start of the Russian unprovoked and unjustified war of aggression against Ukraine has been significantly reduced and cannot be implemented at the moment.

Against this backdrop, the ZNPP faces a shortage of spare parts needed for maintenance. Another major concern is the disruption of the Plant's maintenance schedule due to its occupation by the Russian armed forces.

In addition to the above, the Russian terrorist attack on the Kakhovka HPP made the start-up of all power units of the ZNPP impossible.

It is highly likely that the Russian occupying forces have already removed some of the equipment necessary for ensuring nuclear safety from the ZNPP and the training centre.

The unauthorized interference by Rosatom and Russian nuclear regulator Rostekhnadzor into the operation of the ZNPP increased risks to the nuclear safety of this facility.

Personnel (pillar 3):

The ISAMZ reported “uncertainty” about the staffing situation at the ZNPP and called it “complex and challenging”.

The humanitarian situation at the occupied ZNPP and its satellite city of Enerhodar remain dire due to a number of factors, including:

- constant repressions, terror, intimidation, abuse and torture against the ZNPP personnel by Russian occupying forces;
- forced deportation of residents of Enerhodar, including the personnel of the ZNPP and their family members, to other Russia-occupied territories of Ukraine or to the Russian Federation;

- physical and psychological pressure against the employees of the ZNPP who adhere to the pro-Ukrainian position;
- forced alienation of personal property and obstruction of normal activities of ZNPP personnel.

Remaining staff of the ZNPP and their families in Enerhodar continue to live under Russian occupation with constant violations of their basic human rights.

Significant shortage of professional personnel at the ZNPP creates a high risk of a nuclear incident.

The number of Russian military units at the ZNPP currently exceeds that of Ukrainian personnel.

Against this background, the Permanent Mission of Ukraine draws attention of the Secretariat and the IAEA Member States to another critical staffing factor – non-compliance with the requirements in terms of the number of licensed personnel at the ZNPP.

This issue needs to be given increased attention and assessment by the ISAMZ, as it has a direct impact on the safe operation of the ZNPP.

Secure off-site power supply (pillar 4):

The external power situation at the ZNPP remains very vulnerable. As reported by the ISAMZ, since the start of the Russian full-scale war of aggression against Ukraine, there have been major off-site power outages at the ZNPP.

The Russian armed forces continue indiscriminate shelling of Ukraine's energy infrastructure, thereby endangering the safe operation of the ZNPP and other Ukrainian nuclear power plants.

The scale of the problem with the off-site power supply at the ZNPP cannot be properly and regularly assessed, as the Russian occupying forces prevent the ISAMZ from access to the Zaporizhzhia Thermal Power Plant (ZTPP) and other locations when requested. The content and scope of the unauthorized intrusion of the Russian troops into the functioning of the ZTPP remains unclear.

Logistical supply chain (pillar 5):

Due to indiscriminate shelling by the Russian armed forces and the occupation of the ZNPP, supply chains of equipment and fuel to the Plant have been interrupted.

Transportation channels (road and rail) to and from the ZNPP remain under constant threat from either indiscriminate shelling by the Russian armed forces or sabotage.

Mining of the ZNPP adjacent territory interrupts the logistical supply chains and transportation to and from the Plant.

Such circumstances jeopardize the ability to carry out necessary maintenance work on safety and safety-related systems at the ZNPP.

As reported by ISAMZ, due to the disruption in the supply chains the ZNPP, a significant number and type of spare parts are in short supply, including those required for essential components such as cooling pumps in units Nos. 5 and 6.

On-site and off-site radiation monitoring system and emergency preparedness and response (pillar 6):

The status and reliability of on-site and off-site emergency arrangements for the ZNPP remains a significant concern.

In May 2023, the Russian occupying forces completely stopped transferring off-site radiation monitoring data from the vicinity of the ZNPP site to the State Nuclear Regulatory of Ukraine (SNRIU).

The Russian armed forces continue to occupy the on-site emergency centre, and the temporary centre still does not meet all the necessary requirements to perform the expected emergency response functions. The ZNPP personnel are denied access to this facility.

The off-site emergency centre, located in the city of Zaporizhzhia, is currently not available to the ZNPP due to constant shelling by the Russian armed forces and numerous damages incompatible with normal functioning.

The full on-site emergency plan for the protection of personnel in the event of accidents at the ZNPP cannot be implemented due to restrictions imposed by the occupation forces.

Communications (pillar 7):

The Russian occupying forces terminated official communication between the ZNPP and the SNRIU from November 2022.

Disabling off-site radiation monitoring stations and blocking relevant data exchange between the ZNPP and the SNRIU on IRMIS completely breaks communication of the Plant with competent Ukrainian authorities, which are responsible for its operation.

The Permanent Mission of Ukraine requests the Secretariat of the International Atomic Energy Agency to promptly circulate this Note Verbale as an 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.



Vienna, 30 August 2023