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АКЦИОНЕРНОЕ ОБЩЕСТВО «АККУЮ НУКЛЕАР»

Approach for Obtaining General Permits of Akkuyu NPP Project in Turkey

Dr. Kursad Tosun
Director, Licensing and Governmental Relations

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All permits for the operation of Akkuyu Nuclear Power Plant can be classified as follows:

1. EIA Approval & Other Environmental Permits

2. Law Amendments

3. Zoning Plans & Building Permits

4. Grid Con., Use and Com. Agreements

5. Generation License

6. Land Use Rights

7. Coastal Structures Approval

8. Nuclear Permits

9. Other Permits

10. Conclusion

- ✓ **Intergovernmental Agreement (IGA) was signed between Russian Federation and Republic of Turkey on 12th May 2010.**
- **‘ARTICLE 5 (6) The Turkish Party respectively will take all the necessary measures, as permitted by applicable laws and regulations of the Republic of Turkey, to assure for the timely and proper issuance of all the necessary permits and licenses in accordance with the laws and regulations of the Republic of Turkey.’**
- ✓ **Environmental Impact Assessment (approved by MoEU* in Dec 2014)**
 - **Site Activities are monitored quarterly as per EIA Regulation**
- **To be received during Construction Phase**
 - **Waste Water Treatment Plant Design Approval (WWTP)**
 - **Deep Sea Discharge Design Approval**
 - **Coastal Facility Risk Assessment and Emergency Response Plan Approval**
- **To be received after Construction Phase (before Operation Phase)**
 - **Temporary Environmental Permit for Operation**
 - **Environmental Permit for Operation**

The regulatory framework for permitting and licensing of Nuclear Projects were not in place. Thus, amendments of three laws were necessary;

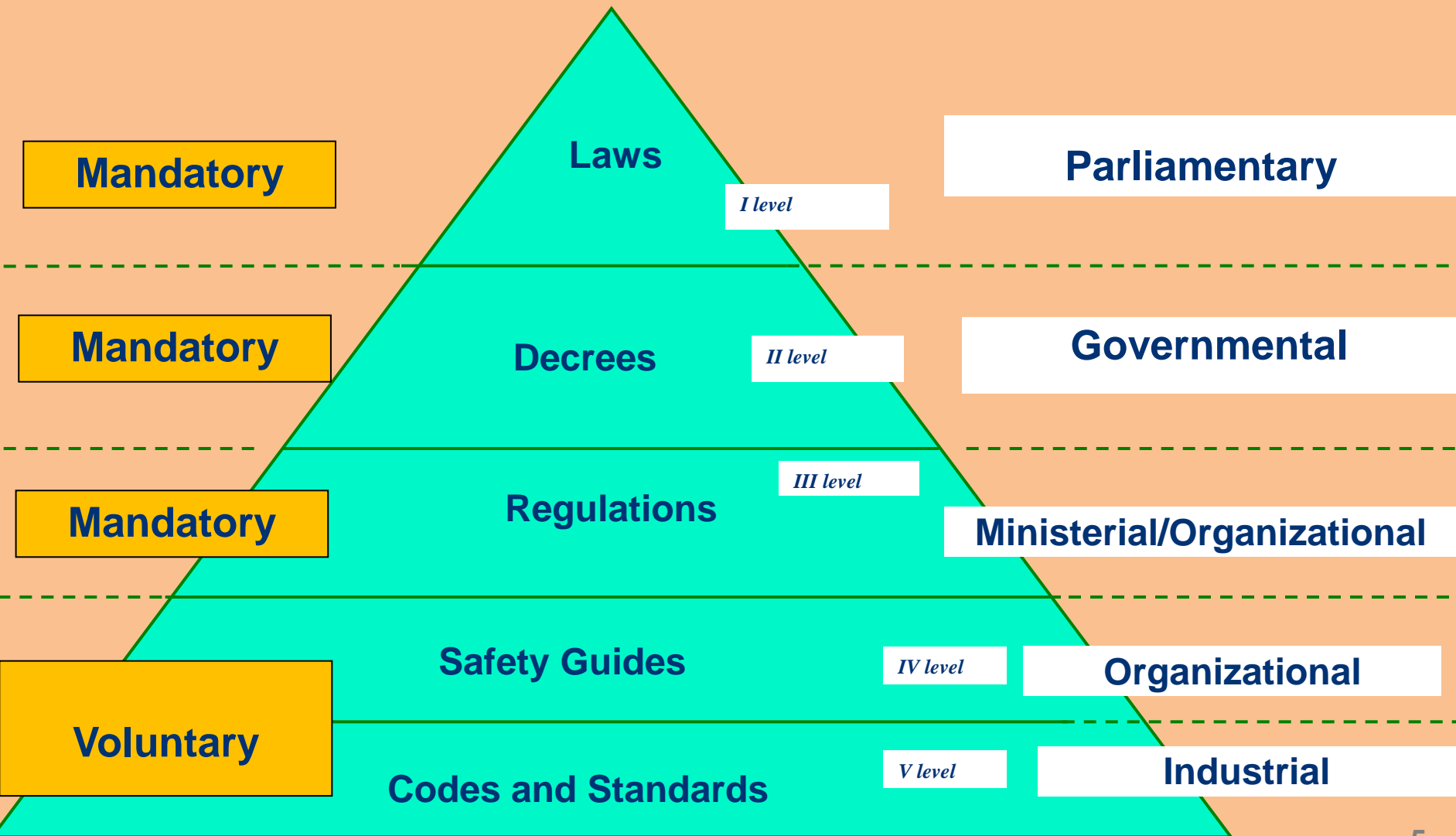
- ✓ Military and Special Security Zone Law; required for Zoning Plan Approval.
- ✓ Electricity Market Law; required for Generation License.
- ✓ Olive Law; required for Zoning Plan Approval and Land Use Rights.

In addition to these amendments TAEK Law was also amended in terms of 'Building Inspection of NPPs'.

Law Amendments were approved on June 17, 2016 by the Parliament and amendment of respective regulations (i.e. Electricity Market Licensing Regulation, TAEK Building Inspection Regulation) are ongoing.



Hierarchy of Regulatory Documents in Turkey



✓ Coastal Zoning Plan (approved in Feb 2015)

- The Revised Coastal Zoning Plan was submitted to MoEU in October'2016. Revision of the approved plan is currently ongoing.

➤ Territorial Zoning Plan

- The Plan was submitted to MoEU for review in September'2016. The approval process is ongoing.

➤ Building Permits

- Building Permit for West Port was obtained on April 10, 2015 from Gülnar Municipality.
- Building Permit for Other Hydrotechnical Structures and Buildings on territorial part will be obtained from Gülnar Municipality as per the Project Schedule.

➤ Connection and System Use Agreement

- Connection and System Use Agreement will be signed with TEIAS (*Turkish Electricity Transmission Company*) right after the Generation License is obtained.

➤ Power Purchase Agreement (PPA)

- Power Purchase Agreement will be signed with TETAS (*Turkish Electricity Trade and Contracting Corporation*) with respect to the Intergovernmental Agreement signed between the Government of Russian Federation and the Government of the Turkish Republic right after the Generation License is obtained.

5. GENERATION LICENSE

✓ Preliminary Generation License

- ✓ Preliminary Generation License was obtained from Energy Market Regulatory Authority on June 25, 2015. Duration of validity is 36 months.

➤ Generation License

- Law Amendments were needed for the application. The amendment of Energy Market Law was approved in June'16. The application for Generation License will be made after the publish of Energy Market Licensing Regulation, accordingly.

6. LANDS USE RIGHTS

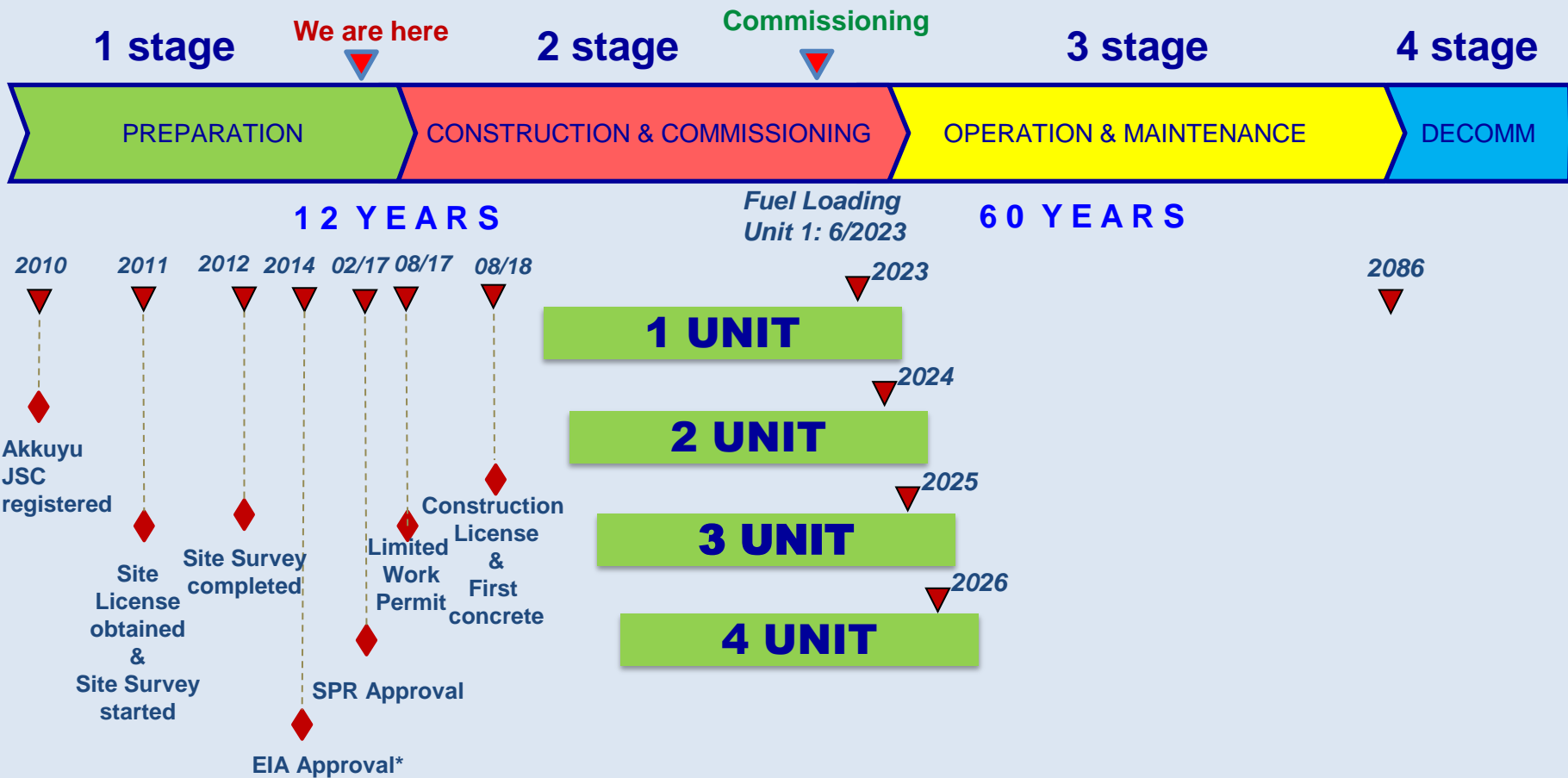
There are three types of land given to Akkuyu Nuclear JSC;

- Ministry of Finance Land (Territorial 165,942 m² and Marine 1,315,713 m²)
- Ministry of Forestry and Water Affairs Land (9,679,160 m²)
- EUAS (Electricity Generation Corporation) Land (493,752.24 m²)
- ✓ EUAS Land was given to Akkuyu Nuclear.
- ✓ Preliminary Land Use Rights for Ministry of Finance and Ministry of Forestry and Water Affairs Land have been received.
- The Final Land Use Rights for these Lands will be received after Generation License is obtained.

7. COASTAL STRUCTURES DESIGN APPROVAL AND ACCEPTANCE

- Design approval and acceptance of Ports, Water Intake Structure and Water Discharge Facilities will be given by Ministry of Transport, Maritime Affairs and Communication (MoTMAC) and Ministry of Environment and Urbanization (MoEU), respectively.
- Design Approval for West Port was taken March 2015 from MoTMAC.
- Design of Other Hydrotechnical Structures are ongoing.

8. NUCLEAR PERMITS



- **Quarry Operations**
 - In order to start site preparation and leveling, excavations and site leveling activities were started in 2013 by Quarry Activities on the project site.
- **Automated Radiation Situation Monitoring System Facilities (ARSMS - around 16 Locations)**
 - To be reviewed and approved by Turkish Atomic Energy Authority.
- **Emergency Management Centres (EMC)**
 - To be reviewed and approved by Turkish Atomic Energy Authority.
- **Operational Staff Accommodation**
 - Strategy and Methodology works are ongoing.
- **Investment Incentive Certificate**
 - To be taken from Ministry of Economy
- **Heliport Permit**
 - To be taken from Directorate General of Civil Aviation
- **Permit For Use of Water Resources**
 - To be taken from State Hydraulic Works

- IGA could be a base/reference for Generation License, Land Use Rights and excavation works on site instead of application of national legislation.
- Law amendments needed to be detected and realized just after the IGA.
- All relevant legislation needed to be aligned according to complex and long project development phase of NPPs.
- All permits needed to be centralized and issued by the ‘Ministry Level’. Permits that are issued by local authorities needed to be issued by relevant ministries in Ankara for NPPs.
- Due to the fact that Akkuyu NPP is the first NPP in Turkey, most of time, permitting authorities are very conservative to issue the permits. International examples might/may be references for the permitting processes for EIA and Nuclear Permits.



***THANK YOU FOR YOUR
ATTENTION and PATIENCE!***