

RNDr. Lukáš Vondrovic, Ph. D.
director

Prague, June 15, 2026

Dear Director,

Further to your letter dated May 11, 2026, requesting information and an opinion on selected issues concerning radioactive waste (RW) and spent nuclear fuel (SNF) management in connection with the New SMR Power Plant at the Temelín site (SMR ETE), the Czech Radioactive Waste Repository Authority (SÚRAO) provides its opinion on the following topics:

- A. Responsibilities of SÚRAO and tasks arising from the Concept of RW and SNF Management in Czechia
- B. Availability of capacity for the disposal of RW from nuclear power plant operation, including New NPPs and SMRs
- C. SNF management
- D. Janoch site
- E. Financing RW management

The information provided is based primarily on the currently discussed update to the Concept of Radioactive Waste and Spent Nuclear Fuel Management in Czechia, which the Government of the Czech Republic acknowledged in Resolution No. 249/2025. We expect it to receive final approval this year.

I would also like to thank your company for participating, as a future license holder, in the joint meetings held at the Ministry of Industry and Trade on future SNF and RW management. I believe that sharing information at this stage of preparation will enable an efficient future system to be established for managing radioactive waste from SMRs

Please let me know if anything is unclear or if the opinion requires any further additions.

Yours sincerely



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Lukáš Vondrovic

Enclosure No. 1: SÚRAO Opinion on Selected Topics in the EIA Screening Procedure for the Construction of SMR ETE.

SÚRAO Opinion on Selected Topics in the EIA Screening Procedure for the Construction of SMR ETE

A. Responsibilities of SÚRAO and tasks arising from the Concept of RW and SNF Management

The Czech Radioactive Waste Repository Authority (hereinafter “SÚRAO”) is a state organizational body established under Section 26 of Act No. 18/1997 Coll. (the Atomic Act) to carry out activities associated with radioactive waste disposal. Section 113 of the new Atomic Act, Act No. 263/2016 Coll., specifies the activities performed by SÚRAO. SÚRAO's activities are financed through the state budget from funds held in the nuclear account. SÚRAO's principal activities are the preparation, construction, commissioning, operation, and closure of radioactive waste repositories; monitoring the effects of radioactive waste repositories on their surroundings; and their institutional control after closure. Other activities include administering radioactive waste disposal fees and inspecting the reserves maintained by license holders for the decommissioning of nuclear facilities. SÚRAO operates on the basis of its government-approved Statute and annual, three-year, and long-term plans of activities, and proceeds in accordance with the Concept of Radioactive Waste (RW) and Spent Nuclear Fuel (SNF) Management in Czechia approved by the Government of the Czech Republic.

SÚRAO currently operates and ensures the safe disposal of RW at three repositories:

- Dukovany repository for the disposal of RW from nuclear reactor operation;
- Richard repository for the disposal of RW from the institutional sector (research, industry, and health care); and
- Bratrství repository for the disposal of RW containing naturally occurring radionuclides.

Following the strategic environmental assessment (SEA) process, the Concept of Radioactive Waste (RW) and Spent Nuclear Fuel (SNF) Management in the Czech Republic was approved by Government Resolution No. 597 of August 26, 2019.

A further update to the Concept of RW and SNF Management in Czechia is currently being prepared, primarily to reflect legislative developments, recommendations from international organizations, and the planned expansion of nuclear power in Czechia. The Government of the Czech Republic acknowledged the draft update in Resolution No. 249/2025. The process is now continuing with screening under Act No. 100/2001 Coll., on Environmental Impact Assessment, including the subsequent SEA process.

The updated Concept fully reflects the requirements of Council Directive 2011/70/Euratom and establishes strategic objectives for RW management. Among other obligations, a license holder for RW management is required under Section 111 of Act No. 263/2016 Coll. (the Atomic Act) to prepare a radioactive waste management strategy in accordance with the national Concept.



B. Availability of capacity for the disposal of RW from nuclear power plant operation, including New NPPs and SMRs

Operational waste from nuclear power plants is disposed of at the Dukovany repository, which has been in operation since 1995. The disposal spaces have a total volume of 55,000 m³ (approximately 180,000 drums) in a total of 112 reinforced concrete chambers arranged in two double rows. This is sufficient for the disposal of all low-level waste from the existing Dukovany and Temelín nuclear power plants and one New NPP, including decommissioning RW that meets the repository's waste acceptance criteria (WAC). Based on current nuclear-power development forecasts, the remaining disposal capacity described in the draft update to the Concept of RW and SNF Management in Czechia is sufficient for the repository's continuous filling until approximately 2079 if four New NPP units and six SMR units are built and Dukovany Units 1-4 and Temelín Units 1 and 2 are decommissioned.

In terms of the characteristics of the waste disposed of, the requirements are determined by the repository's applicable WAC. Compliance with the following is particularly important:

- Use of a suitable solidification matrix. Bitumen and inorganic geopolymer matrices are currently used to solidify liquid operational RW, with requirements governing the strength of the RW solidified in this manner and compliance with the criterion for the leachable fraction from such solidified RW.
- Operational RW is normally conditioned in a 200 l steel drum. Alternatively, certain types of waste may be disposed of as solid items without a waste package, provided that the conditions specified in the WAC are met.

Additional conditions are established in an internal SÚRAO document; the version in effect when the waste is conditioned applies.

The anticipated inventory from all New NPPs and SMRs shows that the repository's existing capacity may not be sufficient for the entire service life of all New NPPs and SMRs (Fig. 1). Specific measures will be implemented to address any future shortfall in operational-waste disposal capacity, depending on the waste characteristics. The options considered include:

- expanding the existing capacity of the Dukovany repository by constructing a third double row, for which a land reserve exists at the site;
- preparing a facility that could accommodate larger volumes of very low-level waste from nuclear power plant decommissioning;
- constructing a new repository of a design similar to the Dukovany repository at a new site;
- disposing of operational RW within the planned deep geological repository complex

The updated Concept includes milestones requiring regular assessment of operational RW and the implementation of necessary technical measures, when required, in response to actual developments in nuclear power (see Table 1).

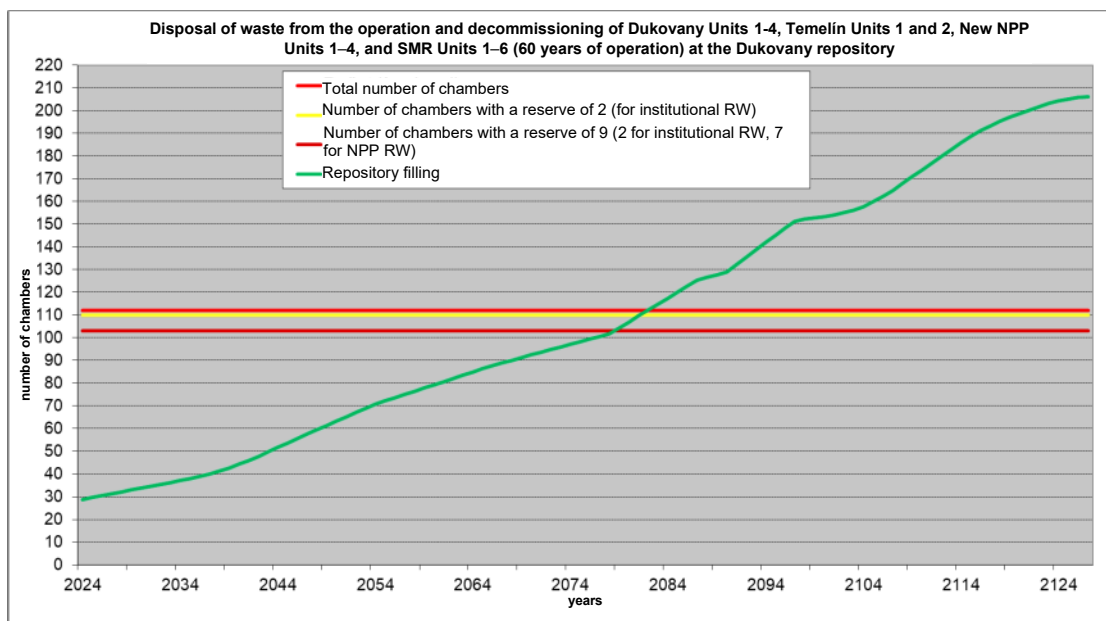


Fig. 1 Estimated Dukovany repository filling schedule

In view of the data you provided on the anticipated parameters of operational waste from SMR ETE, enclosed with your letter of May 11, 2026, the preferred option is the time-limited disposal at the Dukovany repository of operational RW from SMR ETE that meets the WAC applicable at the time of disposal, followed by possible disposal in the deep geological repository. This option is preferred because operational RW from all existing and anticipated nuclear power plants, namely Dukovany Units 1-4, Temelin Units 1 and 2, four New NPP units, and six SMR units, must be disposed of concurrently, and because of the anticipated waste characteristics, taking account of the current WAC for the Dukovany repository. The capacity of the deep geological repository will also be sufficient for operational waste and SNF, and a site with sufficient spare volume capacity is currently being sought. Given the uncertainties in the schedules for all related construction projects, we generally recommend that the RW producer provide sufficient reserve storage capacity at the site where any RW expected not to meet the Dukovany repository WAC will be generated, covering approximately 10 years of production.

Table 1 Selected milestones concerning the disposal of operational RW under the updated Concept of RW and SNF Management

5.1 Continuously monitor and update the inventory of operational RW and SNF	5.1.1 Monitor the rate at which the capacity of the Dukovany repository is being used and, if necessary, address the construction of additional capacity in response to the actual implementation of New NPP and SMR projects (and reflect this in revisions to estimated cost profiles and assumptions).	Continuously (at least once every 5 years) / SÚRAO
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	5.1.3 Conduct ongoing consultations with the entities responsible for preparing the Concept concerning new nuclear-facility projects that generate RW and SNF	Ongoing/New NPP and SMR investors
6.1 Plans and technical solutions for the management of low- and intermediate-level radioactive waste	6.1.3 Based on strategic studies, the actual implementation of New NPP and SMR projects, and the rate at which capacity is being filled, decide on the further development of the Dukovany repository.	2036–2040/SÚRAO

C. SNF management

The SNF producer is responsible for managing and storing SNF until it is declared to be waste. Until the deep geological repository is commissioned, it is therefore necessary to ensure its safe long-term storage by the producer or under arrangements secured by the producer.

Once it has been declared waste, responsibility for its final disposal transfers to the state-managed system administered through SÚRAO, and the final solution is disposal in a deep geological repository (DGR). The deep geological repository for radioactive waste in Czechia (Fig. 2) is planned for the safe and permanent disposal of all types of radioactive waste that do not meet the WAC for the existing repositories, including unprocessed SNF from nuclear reactors and high-level waste. The DGR concept is based on capacity requirements for the disposal of operational waste and SNF from the existing Dukovany and Temelín nuclear power plants, four New NPP units, and up to six SMR units. The draft update to the Concept of RW and SNF Management in Czechia therefore provides for the SNF from New NPPs and SMRs in both the capacity and scheduling arrangements for the DGR. Commissioning of the DGR is expected to begin in 2050.

The permitting processes for DGR construction include several key steps governed by different legislation. The principal legislation comprises Act No. 263/2016 Coll., the Atomic Act; Act No. 283/2021 Coll., the new Building Act; Act No. 44/1988 Coll., the Mining Act; Act No. 100/2001 Coll., on Environmental Impact Assessment; and Act No. 53/2024 Coll., on Proceedings Related to the Deep Geological Repository for Radioactive Waste.

The technical solution for disposing of SNF in the DGR is based on a modified version of the Swedish KBS-3 disposal concept. This approach entails disposing of individual steel disposal packages in vertically oriented boreholes surrounded by engineered barriers such as a bentonite buffer. Other waste is expected to be disposed of in the appropriate packages (e.g., VBK) in a separate section.

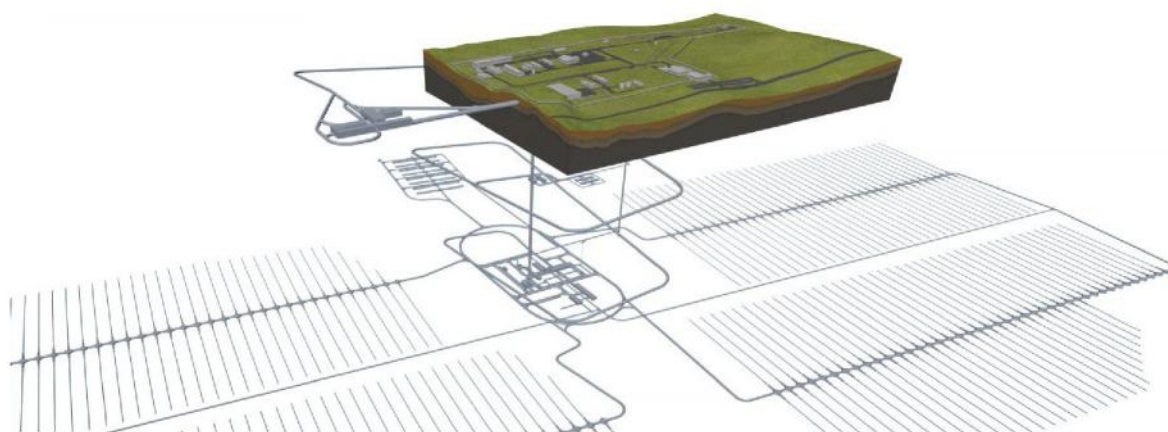


Fig. 2 Diagram of the deep geological repository and its underground and surface facilities

The selection of sites for the DGR in Czechia began in the 1990s, when the Czech Geological Institute, under the direction of the Ministry of the Environment, prepared the first assessment of geological conditions. A 1991 study identified 32 potential areas in the Bohemian Massif, subsequently reduced to 27 geological bodies. Further research in 1993 and 1998 refined the options for site selection, and critical literature reviews identified 13 sites. From the early 1990s until SÚRAO was established, DGR development was coordinated by ÚJV Řež, a. s. After

SÚRAO was established, 11 sites suitable for the DGR were analyzed. A detailed assessment of six selected sites was performed in 2003–2005, resulting in recommendations for further research. Three additional sites, including Janoch, were gradually added to the list between 2011 and 2017. Extensive geological research and exploration work was therefore conducted at a total of nine sites between 2014 and 2019. Following a multicriteria assessment, the Government selected four sites on this basis:

- Březový potok in the Horažďovice area (Plzeň Region);
- Horka between Velké Meziříčí and Třebíč (Vysočina Region);
- Hrádek in the Jihlava area (Vysočina Region);
- Janoch near the Temelín power plant (South Bohemian Region).

These four sites are currently being investigated through characterization work conducted as part of geological exploration and research. Once this has been completed (expected after 2030), SÚRAO will recommend a final site and a backup site for the DGR in Czechia to the Government of the Czech Republic, as envisaged in Section 4 of Act No. 53/2024 Coll. The DGR will be constructed at the final site after 2030.

The anticipated timetable for the preparation, construction, and operation of the DGR according to the draft Concept of RW and SNF Management in Czechia is provided in Table 2.

Table 2: Anticipated timetable for the preparation and operation of the deep geological repository (Concept, 2025)

Milestones	Date
Selection of the final and backup sites	2028–2030
Commencement of the procedure to designate a protected area for special intervention into the Earth's crust	2031
Commencement of the environmental impact assessment process for the project	2031
Siting of the nuclear facility under the Atomic Act	2032
Commencement of the construction of the characterization facility (site investigation using mining methods)	2031–2036
Proceedings for the issuance of a framework permit	2033–2035
Permit to construct a nuclear facility (under the Atomic Act)	2037
Project permit and DGR construction (including the first disposal section)	2040–2050
Permit to commission the nuclear facility (under the Atomic Act)	2046
Permit to conduct activities related to nuclear facility operation	2046
DGR commissioning	2050
Anticipated end of DGR operation	2167

D. Janoch site

The Janoch site is one of four sites currently undergoing further investigation during preparations for the deep geological repository, with a view to the potential future selection of a final site and a backup site. The inclusion of the Janoch site among the four sites undergoing further investigation does not in itself prejudice a decision to locate the deep geological repository at this site.

Its area is defined by the designated investigation area for special intervention into the Earth's crust, within which geological exploration is being conducted, among other purposes, to identify a suitable rock mass at a depth of approximately 500 m for the disposal of SNF and RW and to site the DGR surface facility. The underground section within the investigation area is preliminarily expected to cover approximately 3–4 km², with the DGR surface facility covering up to 15 ha. The preliminary location of the rock masses for the DGR is approximately in the area north of Nová Ves. The potential locations for the surface facilities are, as alternatives, near the Coufalka homestead in the first case and the farms at Výšice in the second. The location of the surface facility will be defined more precisely in fall 2026, while prospective rock masses for the underground section of the deep geological repository can be delineated only on the basis of the results of the ongoing geological exploration, which is expected to continue until 2030.

Based on the current delineation of the Janoch investigation area and the polygons considered to date for siting SMR ETE, we do not anticipate any significant spatial conflict between the two projects. This conclusion relates primarily to siting a nuclear facility under Decree No. 378/2016 Coll. However, potential effects must also be assessed under Act No. 100/2001 Coll., on Environmental Impact Assessment. From SÚRAO's perspective, this assessment follows from the applicable timetable set out in the draft updated Concept of RW and SNF Management in Czechia, forms part of the subsequent preparation process, and is planned for 2031. A definitive assessment of the mutual compatibility of the two projects will, however, be possible only once they have been defined in greater technical and spatial detail during subsequent preparation stages.”

We also note that this statement does not constitute a binding statement within the meaning of Section 20(b) of Decree No. 378/2016 Coll., because the land considered for siting SMR ETE is not within the designated Janoch investigation area.

Table 3 Geographic coordinates of the vertices of the Janoch investigation area in the S-JTSK Křovák coordinate system

Point No.	X	Y
1	-761118	-1144798
2	-754988	-1144428
3	-756592	-1149256
4	-761361	-1148200

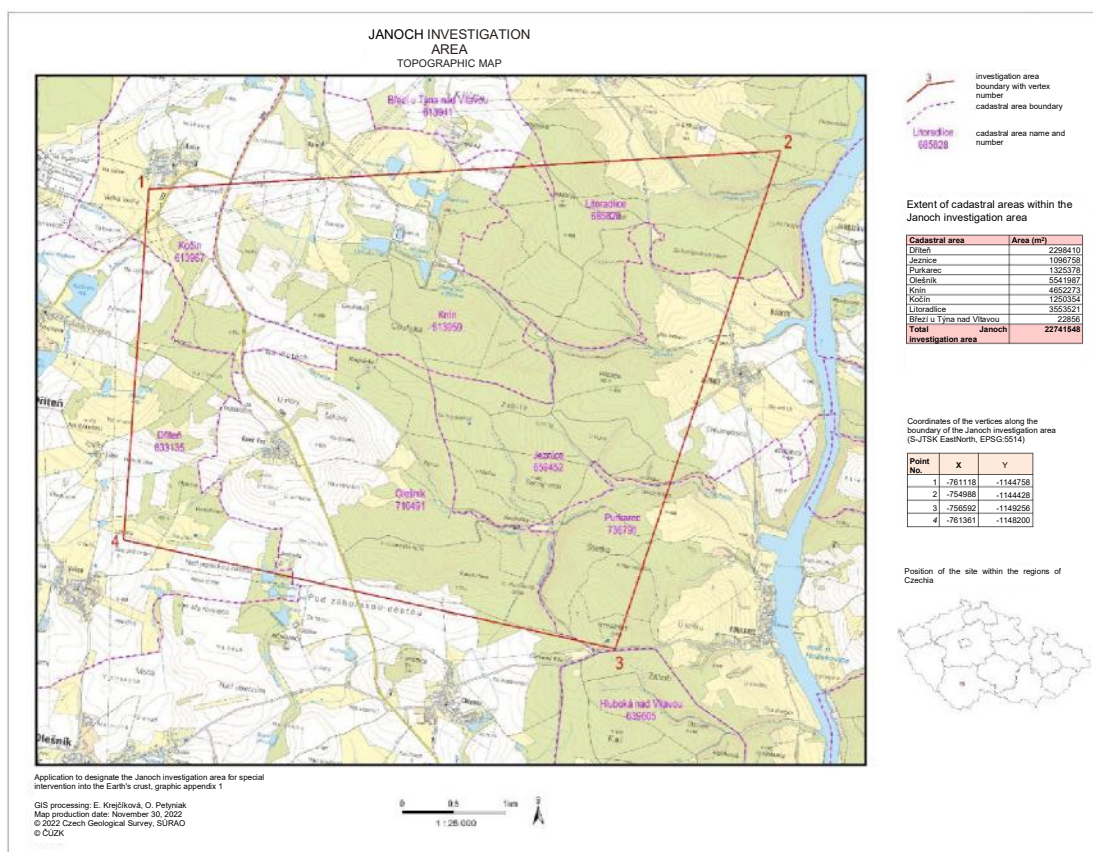


Fig. 3 Map showing the investigation area for special intervention into the Earth's crust at the Janoch site

E. Financing RW management

Under the Atomic Act, the producer bears all costs associated with RW management, meaning costs incurred from the time the waste is generated until its disposal, including the costs of monitoring repositories after closure, as well as the costs of necessary research and development. The producer performs pre-disposal RW management activities itself or engages specialist authorized organizations. In both cases, the producer bears these costs in full. SÚRAO provides for RW disposal and for any conditioning and disposal of SNF after it is declared to be RW. Payment amounts are specified in Act No. 263/2016 Coll. and in a Government Decree, and the producer pays them to the nuclear account in the form of fees.

The nuclear account was established under the Atomic Act to provide financial coverage for all activities associated with RW disposal and, in the future, with the disposal of SNF after it is declared to be RW. It is held by the Czech National Bank and administered by the Ministry of Finance. Funds accumulated in the nuclear account may be used exclusively through SÚRAO to perform the tasks specified in the Atomic Act and included in SÚRAO's Plan of Activities for the relevant year. The management of financial resources for RW and SNF management and the decommissioning of nuclear facilities is subject to a European Commission recommendation. Funding is obtained from several sources. The principal sources include:

- regular fees from radioactive waste producers, based on the valuation of activities associated with conditioning and disposing of spent nuclear fuel after it is declared to be RW and with disposing of radioactive waste; under Government Decree No. 98/2025 Coll., the rate is set for a five-year period at CZK 88/MWhe and CZK 35/MWht, effective January 1, 2026. For the thermal-energy rate, an amendment to the Atomic Act is expected to cover not only research reactors but also nuclear facilities whose principal purpose will be the production of thermal energy, with a view to the future use of SMR reactors for district heating.
- one-time fees from radioactive waste producers, based on the valuation of activities associated with radioactive waste disposal; under Section 1 of Government Decree No. 35/2017 Coll., the one-time fee in 2017 was CZK 145,000/m³ for radioactive waste in the form of a standard disposal unit meeting the limits and conditions for the repository concerned as approved by the State Office for Nuclear Safety, or CZK 174,000/m³ for other radioactive waste, with these rates increasing by 2% in each subsequent year; under the proposed amendment to this Decree, or the amendment to the Atomic Act adopted in 2025, the one-time fee may be up to CZK 250,000/m³ for radioactive waste in the form of a standard disposal unit meeting the limits and conditions for the repository concerned as approved by the State Office for Nuclear Safety, or CZK 300,000/m³ for other radioactive waste;
- returns from financial-market transactions involving nuclear-account funds under the conditions established by the Atomic Act, conducted by the Ministry of Finance;
- paid SÚRAO activities, grants, and payments received from abroad (IAEA and EU projects).

Nuclear-account funds are managed in accordance with the rules established by the Atomic Act and are released on the basis of SÚRAO's Plan of Activities approved by the Government and the State Budget Act for the relevant year. The amounts and methods of paying the fees are established by the Atomic Act and a Government Decree. SÚRAO administers fees paid into the nuclear account and prepares the supporting documentation used to establish them. The assets in the nuclear account amounted to CZK 46.34 billion at the end of 2025. The total costs of constructing, operating, and closing the deep geological repository and the Dukovany repository amount to CZK 280 billion, assuming an inventory for disposal from Dukovany



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Units 1-4, Temelín Units 1 and 2, four New NPP units, and SMRs. These costs are included in the regular fees paid by radioactive waste producers under Government Decree No. 98/2025 Coll.

A substantial portion of payments to the nuclear account is intended to cover the costs of activities that will take place in the future. The methodology for setting fee amounts is based on current price levels and takes into account known cost estimates, risks, and other relevant factors, such as anticipated national economic development, interest rates, inflation, and the New NPP construction scenarios assumed in the State Energy Policy. It complies with the Concept of RW and SNF Management in Czechia and will also be regularly adjusted to reflect potential investors' published plans for the construction of New NPPs and, prospectively, SMRs. The accumulation of funds in the nuclear account is compared with anticipated future expenditure at appropriate intervals of no more than five years. If material deviations are identified, the relevant Government Decree will be amended or an amendment to the relevant provision of the Atomic Act will be initiated.

Prague, June 15, 2026



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