

Information Circular

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General Distribution
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Communication from the Permanent Mission of the Russian Federation to the Agency

1. On 25 March 2025, the Secretariat received a Note Verbale from the Permanent Mission of the Russian Federation to the Agency.
2. As requested, the Note Verbale is herewith circulated for the information of all Member States.

Unofficial Translation

ПОСТОЯННОЕ ПРЕДСТАВИТЕЛЬСТВО
РОССИЙСКОЙ ФЕДЕРАЦИИ
ПРИ МЕЖДУНАРОДНЫХ ОРГАНИЗАЦИЯХ
В ВЕНЕ



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The Permanent Mission of the Russian Federation to the International Organizations in Vienna presents its compliments to the Secretariat of the International Atomic Energy Agency and has the honour to request to circulate among all IAEA Member States as soon as possible comments on the report of the IAEA Director General Rafael Grossi "Nuclear Safety, Security and Safeguards in Ukraine", prepared on the occasion of the regular session of the Agency Board of Governors (Vienna, 3-7 March 2025).

We have to note with regret that the latest report by IAEA Director General Rafael Grossi, "Nuclear Safety, Security and Safeguards in Ukraine," turned out to be unbalanced and still contains a number of serious inaccuracies.

The key drawback of the report is the lack of reference that the Zaporozhskaya NPP (ZNPP) is a Russian nuclear facility. We remind that on October 5, 2022, Decree of the President of the Russian Federation No. 711 "On Specific Legal Provisions Governing Nuclear Energy Use on the Territory of the Zaporozhskaya region" was signed, which secured the status of the ZNPP as a facility under Russian jurisdiction. In accordance with this Decree, JSC "Operating Organization of the Zaporozhskaya NPP" is granted the status of an operating organization in the field of use of atomic energy, which, on its own or with the involvement of other organizations, carries out activities to operate the nuclear energy facilities of the ZNPP.

THE SECRETARIAT OF THE
INTERNATIONAL ATOMIC ENERGY AGENCY
Vienna

In accordance with paragraph 2 of the Decree, permissions (licenses) for the right to carry out work in the field of use of atomic energy, issued in relation to ZNPP, remain valid until permissions (licenses) are issued in accordance with the legislation of the Russian Federation.

We emphasize that the IAEA Secretariat experts who have been at the ZNPP since September 1, 2022, are present there with the consent and at the invitation of the Russian Federation. There is no "IAEA mission" at the ZNPP. All activities of the Agency Secretariat specialists are assured through the efforts of Russian organizations. These specialists are granted access to the plant's facilities with due allowance for the immediate proximity of the ZNPP to the combat line and the Ukrainian threats to its security.

The report covers up Ukraine's guilt for the repeated disruptions of the IAEA Secretariat experts rotation at the ZNPP. The fact of the Ukrainian attack on the vehicles used to transport Secretariat experts during the rotation on December 10, 2024, is presented in a purely neutral manner (paragraph 11). The Ukrainian massive artillery and mortar shelling of the group of experts during another attempt to rotate Agency representatives on February 12, 2025, is not mentioned at all. At the same time, the report contains a vague wording as for the reason for cancelling the rotation, stating that the rotation of the IAEA Secretariat experts at the ZNPP allegedly did not take place "due to ongoing military activities that put the safety of Agency staff at risk" and that the Agency "engaged in intensive consultations with both sides" to carry out the rotation in safe conditions (paragraphs 22, 155). Such wording does not reflect the obvious fact - the blame for the disruptions of the rotations lies entirely with Ukraine.

Russia has made every effort to ensure the safety and security of the IAEA Secretariat experts. From February 27 to March 3, 2025, the rotation of the Agency experts was for the first time done exclusively through the Russian territory. Throughout the entire route, Russian representatives ensured the safety and security of the IAEA representatives and eliminated the risks of Ukrainian provocations.

The report also still lacks critical assessments in connection with the regular attacks by Ukrainian UAVs against the ZNPP facilities and the town of Energodar. The only episode cited – the UAV strike on January 5, 2025 on the station's training center – is presented in an anonymous manner (paragraph 50).

The Ukrainian campaign of psychological terror against ZNPP personnel via social networks continues to be completely hushed up.

We categorically reject the IAEA Secretariat attempts to present the Russian security of the ZNPP and the specialists of the troops of radiation, chemical and biological protection (CBRN) present at the plant as some kind of threat to the nuclear safety and security of this facility (paragraph 83). Such an interpretation is a gross distortion of reality.

The report does not reflect the interaction of the Russian regulatory body and the experts of the IAEA Secretariat at the ZNPP, who participate in the control and supervision activities of Rostekhnadzor. In this context, the reference to the interrupted communication channels with the Ukrainian regulator – SNRIU – looks absurd (paragraphs 71, 76). SNRIU has no relation to the ZNPP.

Questions are raised with regard to paragraph 60 stating: “for the Agency to be able to fully assess the staffing situation at the ZNPP, including in relation to qualifications and training, and reach a conclusion regarding its potential implications for nuclear safety and security, timely and precise information as well as open discussions with all relevant staff continue to be needed.” We remind that the ZNPP employs qualified personnel who have received licenses from the Russian regulatory authority, and an assessment of their competence by the IAEA Secretariat is not required.

We do not recognize the right of the IAEA Secretariat to express an opinion regarding the timing of the ZNPP shutdown (paragraphs 47, 147). This issue will be resolved by Russia independently. The management of Rosatom has already expressed its opinion on this matter.

We would like to specifically address the new distortions of facts in the report.

The appearance in the report of wording in the style of “highly likely / very likely” in relation to the incident with the Ukrainian UAV that hit the Chernobyl Nuclear Power Plant Shelter on February 14 is objectionable (paragraph 106). It challenges the Agency impartiality and undermines confidence in the objective, depoliticised and technically verified nature of its assessments and conclusions. Such value and clearly biased judgments are absolutely unacceptable for the leadership of the Agency that claims to be an independent and technical international organization. It is unclear how the IAEA Secretariat experts, who, according to recent statements by the Secretariat itself, do not have military qualifications, took upon themselves the attribution of the UAV.

Section B.1.2 of the report, devoted to the Agency missions to Ukrainian electrical substations, is no less controversial. In violation of the mandate provided by the IAEA Statute, it states that during visits to Ukrainian substations, Agency Secretariat experts recorded damage and collected evidence highlighting the vulnerability of the electrical grid due to attacks on Ukraine's energy infrastructure. Contrary to the provisions contained in this section, external energy supply to NPPs is far from being of decisive importance from the point of view of ensuring nuclear safety. The performance by the Secretariat of alien functions, related to the ongoing assessment of the extent of damage caused to Ukraine's energy infrastructure, including substations, goes far beyond the IAEA mandate. We do not consider this activity to be an integral part of the Agency personnel duties.

We hope that the IAEA Secretariat will take into account Russian comments and observations when preparing the next relevant reports.

The Permanent Mission of the Russian Federation kindly requests the Secretariat to promptly circulate this Note Verbale as an Information Circular to all IAEA Member States.

The Permanent Mission of the Russian Federation avails itself of this opportunity to renew to the IAEA Secretariat the assurances of its highest consideration.

Vienna, "24" March 2025