

# Information Circular

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## Communication from the Permanent Mission of Ukraine to the Agency

1. On 28 March 2025, the Secretariat received a Note Verbale, together with an attachment, from the Permanent Mission of Ukraine to the Agency.
2. As requested, the Note Verbale and its attachment are herewith circulated for the information of all Member States.



**Permanent Mission of Ukraine**  
to the International Organizations  
in Vienna

Wallnerstrasse 4,  
1010, Vienna,  
Republic of Austria

(+431) 479 7172,  
pm\_io@mfa.gov.ua

Nº 4131/35-197-36587

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 transmit herewith the Commentary of the State Nuclear Regulatory Inspectorate of Ukraine on the Dissemination of Information regarding Intentions to Transfer the Zaporizhzhia NPP Power Units from Subcritical Conditions to Energy Power Levels of 28 March 2025.

The Permanent Mission kindly requests the Secretariat of the IAEA to 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 Secretariat of the International Atomic Energy Agency the assurances of its highest consideration.

Encl.: 1 page.



Vienna, 28 March 2025

**Secretariat**  
**International Atomic Energy Agency**  
**Vienna**

**COMMENTARY OF THE THE STATE NUCLEAR REGULATORY INSPECTORATE OF UKRAINE  
on the Dissemination of Information regarding Intentions to Transfer the Zaporizhzhia NPP Power  
Units from Subcritical Conditions to Energy Power Levels**

**28 March 2025**

In connection with the recent dissemination of information, various assessments, and statements regarding the possible transition of the Zaporizhzhia NPP power units from subcritical conditions to energy power levels, the State Nuclear Regulatory Inspectorate of Ukraine states the following.

As of today, all six power units of the Zaporizhzhia NPP of SE NNEGC "Energoatom" (hereafter ZNPP) remain in a state of cold shutdown as a result of their forcible military seizure in March 2022, followed by the unlawful appropriation by the occupying authorities of the Russian Federation in October 2022. This unprecedented act is inconsistent with the UN Charter, international humanitarian law, and the IAEA's basic safety principles, and makes it impossible to safely operate a nuclear facility for peaceful purposes because of the lack of:

- a ultimate heat sink;
- reliable water supply;
- stable external power supply;
- proper technical maintenance;
- qualified personnel with appropriate training and licensing for the operation of these nuclear facilities;
- emergency preparedness and response infrastructure;
- an early warning and radiation monitoring system in the observation zone;
- civil liability on the part of the occupying administration for nuclear damage.

Instead, the staff of the ZNPP remains under constant pressure and surveillance by the military, who have established firing positions on the site, store munitions in buildings and structures, and have mined surrounding areas. Despite the resolutions of the IAEA General Conference and Board of Governors, as well as the UN Security Council, the occupying forces continue to use the seized ZNPP as a military base.

Any changes to the licensing conditions for the operation of ZNPP power units are only possible after de-occupation, demilitarization, demining, and comprehensive safety verification of all systems, structures and components of the plant, and after the plant is returned under the full control of the legitimate operating organization, SE NNEGC "Energoatom", and oversight of the legitimate regulatory body, State Nuclear Regulatory Inspectorate of Ukraine.

Any statements or comments regarding intentions or methods of "restarting" the power units under the current circumstances are provocative and speculative, as well as have no relevance to the issue of nuclear safety in the European region. The IAEA, acting under its Statute, may provide recommendations and continue monitoring the safety status at the ZNPP, but all decisions regarding the licensing of nuclear installations remain the responsibility of the legitimate national authorities of member states.

For the ZNPP, such legitimate management and regulatory authorities have been, are, and will remain the governmental authorities of Ukraine.