

This is an unofficial translation of the text.

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**Govt. decree 112/2011. (VII. 4.) Korm.**

**on the scope of authority of the Hungarian Atomic Energy Authority in relation to European Union obligations and international obligations in connection with atomic energy, on the designation of co-authorities contributing to the regulatory proceeding of the Hungarian Atomic Energy Authority, and on the scientific council assisting the work of the Hungarian Atomic Energy Authority**

The Government, based on the authorizations given in Subsections *a)* and *i)* of Article 67 of the Act CXVI of 1996 on atomic energy and in Subsections *a)* and *bb)* of Article 174/A of the Act CXL of 2004 on the general rules of public administration proceedings and services, in its role of task defined in Subsection *c)* of Article 35 (1) of the Constitution orders the following:

**1. § (1)** The Hungarian Atomic Energy Authority (hereinafter referred to as HAEA):

*a)* coordinates the Hungarian participation in the frame programmes of the European Atomic Energy Community (Euratom) and fulfils the tasks as a national contact point in relation to the frame programme;

*b)* cooperates with the International Atomic Energy Agency, the Nuclear Energy Agency of the Organization of Economic Cooperation and Development, and the European Atomic Energy Community, as well as other international and regional intergovernmental organizations operating in the field of peaceful use of atomic energy;

*c)* fulfils the tasks serving the Hungarian implementation of intergovernmental agreements concluded in the field of safe application of atomic energy;

*d)* takes care of the fulfilment of those international obligations relating to the safe application of atomic energy that are designated to its scope of authority:

with regard to

*da)* nuclear safety,

- db)* safe management of radioactive wastes and spent fuel,
  - dc)* nuclear emergency response,
  - dd)* nuclear security,
  - de)* non-proliferation of nuclear weapons, and
  - df)* liability for a nuclear damage;
- e)* prepare drafts of national reports to be fulfilled based on the international obligations connecting to subsections *da)* és *db)* above;
- f)*<sup>1</sup> prepare the draft of the report on the implementation of the Council Directive 2009/71/Euratom,
- g)* with the simultaneous notification of the minister supervising the atomic energy supervisory organization, takes care of requesting the international peer review serving for the continuous development of the nuclear safety of nuclear facilities,
- h)* takes care of the member state self-assessment of legislations serving for the nuclear safety of nuclear facilities and competent authorities pursuant to Council Directive 2009/71/Euratom,
- i)* submits the national programme presenting the implementation of the goals of the national policy covering every phase of spent fuel and radioactive waste management from their generation to their final disposal (hereinafter referred to as the national programme) as well as any significant amendments to the national programme to the European Commission,
- j)* provides the European Commission with any clarification and information requested in relation to the national programme,
- k)* notifies the European Commission of the eventual revision of the national programme,
- l)* takes care of the member state self-assessment of legislations and competent authorities serving for the responsible and safe management of spent fuel and radioactive waste, as well as the national programme and its implementation, pursuant to Council Directive 2011/70/Euratom,
- m)* prepares the draft of that part of the report on the implementation of Council Directive 2011/70/Euratom which regards the spent fuel, and compiles the whole report,

*n)* with the simultaneous notification of the minister supervising the atomic energy supervisory organization, takes care of requesting the international peer review serving for the sake of high quality and safe management of spent fuel and radioactive waste.

(2) In line with Points *f)* and *m)* of Subsection (1), the minister supervising the atomic energy supervisory organization takes care of the fulfilment of the reporting obligation towards the European Commission.

**2. §** (1) Unless this decree stipulates otherwise, the amount of the penalty defined in Subsection (2) of Article 15 of the Act CXVI of 1996 on Atomic Energy (hereinafter referred to as *Atv*) is fifty-thousand forints as minimum and three-millions forints as maximum.

(2) Against the licensee of a nuclear power plant, in a nuclear safety regulatory case, the amount of the penalty is fifty-thousand forints as minimum and fifty-millions forints as maximum.

(3) Against the licensee of a nuclear facility other than a nuclear power plant, in a nuclear safety regulatory case, the amount of the penalty is fifty-thousand forints as minimum and five-millions forints as maximum.

(4) Against the licensee of a nuclear facility, in a regulatory case commenced because of the violation of an obligation defined in legislations on the application of safeguards established in the treaty on the non-proliferation of nuclear weapons, the amount of the penalty is fifty-thousand forints as minimum and five-millions forints as maximum.

**3. §** The amount of the penalty shall be determined by taking account of every circumstance of the case, especially

*a)* whether the violation or omission of a rule entailed the occurrence of an extraordinary event, nuclear emergency or nuclear damage,

*b)* the severity of the violation of requirements and stipulations,

*c)* whether the violation of a rule reoccurred,

*d)* whether a behaviour inducing the violation or omission of a rule occurred,

*e)* whether the person violating or omitting the rule showed assisting, consequence mitigating behaviour intending to terminate the caused situation.

**4. §** The penalty shall be paid to the expenditure frame account of the HAEA maintained at the Hungarian Treasury.

**5. §** The Government designates the authorities listed in Annex 1 and 2 as co-authorities in the regulatory proceedings of the HAEA, regarding the defined issues, with the defined conditions. At the request of the client submitted prior to the commencement of the proceeding, the authority designated as co-authority issues a preliminary co-authority opinion that is valid for a year.

5/A. § The relevant deadline for the proceeding of the co-authority is

*a)* forty-five days

*aa)* in cases determined in Paragraph 1 of Subsection (2) of Section 17 of the Atv,

*ab)* in cases determined in Paragraph 5 of Subsection (2) of Section 17 of the Atv, if the modification of the nuclear facility requires the modification of the operating license of the nuclear facility,

*ac)* in cases determined in Paragraph 10 of Subsection (2) of Section 17 of the Atv, and

*ad)* in the case of definition of the design basis threat at the first time and licensing the physical protection system at the first time in accordance with Paragraph 18 of Subsection (2) of Section 17 of the Atv,

*b)* thirty days, with the exemption of Sub-Paragraph *ab)* of Paragraph *a)* in cases determined in Paragraphs 3-9 of Subsection (2) of Section 17 of the Atv.

(2) The head of the co-authority, if justified, may extend the relevant deadline as per Subsection (1) once with ten days. The co-authority shall inform the client and the HAEA on the extension of the deadline.

5/B. § (1) The relevant deadline for the proceeding of the co-authority with regard to radioactive waste temporary storage and final disposal facilities (hereinafter referred to as radioactive waste repositories)

*a)* forty-five days,

*aa)* in cases addressing site survey and evaluation,

*ab)* in cases determined in Paragraph 15 of Subsection (2) of Section 17 of the Atv,

*b)* thirty days in the following cases

*ba)* regulatory licensing and inspection of civil structures being in connection with the radioactive waste repositories, and the regulatory licensing of the elevators of these civil structures,

*bb)* licensing and inspection of activities connecting to the modification, dismantling and closure regarding a system, structure or component of the radioactive waste repository,

*bc)* licensing and inspection required for the modification of radioactive waste repositories,

*bd)* licensing and inspection required for the modification of a system, structure and component of radioactive waste repositories, and the modification of the organizational structure, management system, technical and regulating document of the licensee,

*be)* nuclear safety licensing required for the approval of the nuclear emergency response plan of radioactive waste repositories.

(2) The head of the co-authority, if justified, may extend the deadline relevant for the co-authority proceeding once with ten days. The co-authority shall inform the client and the HAEA on the extension of the deadline.

**6. §** (1) The Scientific Council assisting the work of the HAEA is a body consisting of 12 member being nationwide recognized experts in the field of application of atomic energy. The Scientific Council, with the consideration of advanced scientific results, makes opinion on the most important principle and scientific issues arisen in connection with non-proliferation of nuclear weapons, safety and security of nuclear facilities, nuclear and other radioactive materials and radioactive wastes. The Scientific Council itself determines its terms of reference.

(2) The chair and the members of the Scientific Council are appointed and relieved, based on the proposal of the director general of the HAEA, by the minister supervising the HAEA.

(3) The Secretary of the Scientific Council works within the frame of the HAEA. The relating costs shall be planned in the budget of the HAEA.

**7. §** This decree will come into force on the 30th day following its promulgation.

**7/A. §** The first notification in point *i*) of Subsection (1) of Section 1 shall be made by August 23, 2015 as latest.

7/B. § (1) Subsection (1) of Section 5 established by the Govt. decree 139/2014. (IV.30.) Korm on the modification of certain atomic energy related government decrees (hereinafter referred to as Mod Govt. decree) shall apply to proceedings being in progress at the date when the Mod Govt. decree steps into force, with the exemption of such procedural actions, the deadline for the accomplishment of which has already been expired before the date when the Mod Govt. decree steps into force.

(2) The co-authority, within eight days subsequent to the date when the Mod Govt. decree steps into force, shall inform the clients of proceeding determined in Subsection (1) on the change of deadlines and the expected duration of the proceeding, unless it issues its opinion within 8 days subsequent to the date when the Mod Govt. decree steps into force.

**8. §** Points *f*) and *g*) of Subsection (1) of Section 1 and Subsection (2) serve for the adherence to Subsection (1) and (3) of Article 9 of the Council Directive 2009/71/Euratom of June 25 2009 establishing a Community framework for the nuclear safety of nuclear installations.

**9. §** This decree serve for the adherence to the Council Directive 2011/70/Euratom of 19 July 19 2011 establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste.

*Annex 1 to the Govt. decree 112/2011. (VII. 4.) Korm.*

**Co-authorities contributing to the regulatory proceedings of the HAEA**

	Condition of involvement and contribution	Issue to be addressed	Proceedings	Proceeding co-authority
1.	A	B	C	D
2.1.	In the case of a nuclear facility	Granting consent and establishment of conditions based on the assessment of discharges of radioactive materials to air, monitoring of the radioactive contamination of air and the discharge limit values, according to the ministerial decree on radioactive discharges to air and water during the application of atomic energy and monitoring thereof.	<i>a)</i> construction license, <i>b)</i> license of operation beyond the design lifetime, <i>c)</i> final shut-down license, <i>d)</i> commissioning license, <i>e)</i> operation license, <i>f)</i> decommissioning license	Pécs District Authority of Baranya County Government Office proceeding in its Environmental Protection and Nature competence
2.2.	In the case of a nuclear facility	Granting consent and establishment of conditions based on the assessment of	<i>a)</i> construction license, <i>b)</i> license of operation beyond the design lifetime,	Pécs District Authority of Baranya County Government Office proceeding in its Environmental Protection and Nature competence

		discharges of radioactive materials to water, protection of waters and water retaining structures against radioactive and thermal contamination, monitoring of the radioactive contamination of water environment and the discharge limit values, according to the ministerial decree on radioactive discharges to air and water during the application of atomic energy and monitoring thereof.	c) final shut-down license, d) commissioning license, e) operation license, f) decommissioning license	
2.3.	In the case of a nuclear facility if the licensed activity may change the discharges, discharge limit	Granting consent and establishment of conditions based on the assessment of discharges of radioactive materials to air, monitoring of	licensing of the modification of a nuclear facility	Pécs District Authority of Baranya County Government Office proceeding in its Environmental Protection and Nature competence



	<p>values, the data serving as the basis for the establishment of discharge limit values, control of discharges, environmental monitoring, thermal load in relation to the nuclear facility;</p> <p>may change the place and method of generation, the generated activities, the mode and way of discharge, the activity, activity concentration of physical-chemical properties of the discharged</p>	<p>the radioactive contamination of air and the discharge limit values, according to the ministerial decree on radioactive discharges to air and water during the application of atomic energy and monitoring thereof.</p>		
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	radioactive material, the mass or volume flow rate of discharge, or the planned discharge levels and entail the modification of the operation license in relation to the discharged radioactive isotopes and materials.			
2.4.	In the case of a nuclear facility if the licensed activity may change the discharges, discharge limit values, the data serving as the basis for the	Granting consent and establishment of conditions based on the assessment of discharges of radioactive materials to water, protection of waters and water retaining structures against radioactive and thermal	licensing of the modification of a nuclear facility	Pécs District Authority of Baranya County Government Office proceeding in its Environmental Protection and Nature competence

<p>establishment of discharge limit values, control of discharges, environmental monitoring, thermal load in relation to the nuclear facility;</p> <p>may change the place and method of generation, the generated activities, the mode and way of discharge, the activity, activity concentration of physical-chemical properties of the discharged radioactive material, the mass or volume flow</p>	<p>contamination, monitoring of the radioactive contamination of water environment and the discharge limit values, according to the ministerial decree on radioactive discharges to air and water during the application of atomic energy and monitoring thereof.</p>		
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	rate of discharge, or the planned discharge levels and entail the modification of the operation license in relation to the discharged radioactive isotopes and materials.			
2.5.	Periodic Safety Review Report according to the act on atomic energy.	Judgment on whether the parts of the Periodic Safety Review Report describing the long term environmental tendencies, the adequacy of the environmental monitoring system and programme, the radiation load to the environment caused by the operation of the facility, the	Review of the Periodic Safety Review Report and the approval of revealed deviations	Baranya County Government Office proceeding in its Environmental Protection and Nature competence

		analysis of the measured data of the environmental monitoring system, the evaluation of results, the evaluation of the adequacy of the environmental radiation monitoring system and environmental monitoring programme are in compliance with the environment and nature protection requirements established in a separate law, in relation to the assessment of environmental effects induced by the nuclear facility.		
2.6.	Periodic Safety Review Report according to	Judgment on whether the parts of the Periodic Safety Review Report	Review of the Periodic Safety Review Report and the approval of revealed deviations	Pécs District Authority of Baranya County Government Office proceeding in its Environmental Protection and Nature competence

	the act on atomic energy.	describing the long term environmental tendencies, the adequacy of the environmental monitoring system and programme, the radiation load to the environment caused by the operation of the facility, the analysis of the measured data of the environmental monitoring system, the evaluation of results, the evaluation of the adequacy of the environmental radiation monitoring system and environmental monitoring programme are in compliance with the water protection requirements established in a separate law, in		
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		relation to the assessment of environmental effects induced by the nuclear facility.		
2.7.	In the case of nuclear facility.	Compliance with requirements for protection against environmental noise and vibration according to the provisions of the Govt. Decree on the rules protection against environmental noise and vibration.	<i>a)</i> construction license, <i>b)</i> license of operation beyond the design lifetime, <i>c)</i> final shut-down license, <i>d)</i> commissioning license, <i>e)</i> operation license, <i>f)</i> decommissioning license	Pécs District Authority of Baranya County Government Office proceeding in its Environmental Protection and Nature competence
3.1.	In the construction licensing proceeding of the nuclear facility.	Compliance with the radiation health and radiation protection requirements for the protection of the population and the operating personnel against radiation exposure caused by the operation of the nuclear facility.	<i>a)</i> construction license, <i>b)</i> decommissioning license	Office of the National Chief Medical Officer, State Public Health and Medical Officer Service

3.2.	In proceeding relating to buildings of the nuclear facility.	Compliance with public health requirements.	construction (deconstruction) and utilization license	Regionally competent health state administration organization
3.3.	Periodic Safety Review Report according to the act on atomic energy.	Compliance with radiation health and radiation protection requirements, conditions of compliance.	Review of the Periodic Safety Review Report and the approval of revealed deviations	Office of the National Chief Medical Officer, State Public Health and Medical Officer Service
3.4.	In proceeding aiming at licensing the transport of radioactive wastes and spent fuels through the border of Hungary.	Judgment on whether radiation health and radiation protection requirements for the transport of nuclear and other radioactive materials and radioactive wastes are met..	licensing of transport	Office of the National Chief Medical Officer, State Public Health and Medical Officer Service
3.5.	In proceeding aiming at the designation of the safety zone of nuclear facilities.	Judgment on whether radiation health and radiation protection requirements are met by the designation of the	designation of the safety zone	Office of the National Chief Medical Officer, State Public Health and Medical Officer Service



		safety zone of the nuclear facility.		
4.1.	In the proceeding aiming at the survey and assessment of the site of the nuclear facility, judgment on the site characteristics and suitability, construction of the nuclear facility, final shut-down of the nuclear facility.	<p>Assessment whether the survey and assessment of the site of the nuclear facility, the specification of the site characteristics and suitability, and the design are in compliance with geology, mining and engineering safety requirements.</p> <p>Quantity, type, determination of the use and utilization of mineral source materials planned to be exploited during the construction of the nuclear facility, enforcement of mineral asset protection interests, and establishment of mine fee payment obligation.</p>	<p>a) site survey and assessment license,  b) site license,  c) construction license,  d) final shut-down license</p>	County Government Office proceeding in its mine supervisory competence

		In the case of final shut-down of the nuclear facility, assessment of the compliance with geology, engineering safety requirements.		
4.2.	In the case of construction, commissioning, operation, modification, final shut-down, as well as modification of the systems, structures and components of the nuclear facility, if any fire and disaster management aspect appears.	Assessment of the compliance with fire and disaster management requirements for systems, structures and components of the nuclear facility.	a) construction license, b) commissioning license, c) operation license, d) modification license, e) final shut-down license, f) construction (demolition) and utilization license	Directorate General of National Disaster Management of Ministry of the Interior
5.1.	In proceeding aiming at	Judgment on whether the physical	licensing of transport	National Police Headquarters

	licensing the transport of radioactive wastes and spent fuels through the border of Hungary.	protection of nuclear facilities, nuclear and other radioactive materials and radioactive wastes are in compliance with law enforcement and personal requirements.		
5.2.	In the scope of the use of atomic energy, in proceeding aiming at regulatory licensing of the physical protection system.	Judgment on whether the physical protection system within the scope of the use of atomic energy is in compliance with law enforcement and personal related requirements.	licensing of the physical protection system	National Police Headquarters
6.1.	Periodic Safety Review Report according to the act on atomic energy.	Assessment of the compliance with fire protection related requirements established by the legislation on specific requirements of fire protection related to	Review of the Periodic Safety Review Report and the approval of revealed deviations	regionally competent disaster management office

		the use of atomic energy and their enforcement during the activity of the authorities.		
6.2.	In proceeding aiming at regulatory licensing of buildings and structures in relation to nuclear facilities.	Assessment of the compliance with fire protection related requirements established by the legislation on specific requirements of fire protection related to the use of atomic energy and their enforcement during the activity of the authorities.	a) construction (demolition) license, b) utilization license	regionally competent disaster management office
7.1.	Periodic Safety Review Report according to the act on atomic energy..	Fire protection and disaster management related assessment of the Periodic Safety Review Report.	Review of the Periodic Safety Review Report and the approval of revealed deviations	Directorate General of National Disaster Management
7.2.	Emergency preparedness and response plan according	Disaster management and civil defence related assessment of the	licensing of the emergency preparedness and response plan	Directorate General of National Disaster Management

	to the act on atomic energy.	plan with regard to the existence and assurance of human and material conditions for the prevention of emergencies, response to and mitigation of consequences, and for effective interventions.		
7.3.	Emergency response plan of the transport of radioactive materials according to Ministerial decree 14/1997. (IX. 3.) KHVM.	Disaster management and civil defence related assessment of the plan with regard to the existence and assurance of human and material conditions for the prevention of emergencies, response to and mitigation of consequences, and for effective interventions.	approval of the emergency preparedness an response plan	regional bodies of the Directorate General of National Disaster Management

7.4.	If the siting and construction of the nuclear facility is realized on agricultural land.	In relation to the quantitative requirements for the protection of agricultural land.	construction license	minister responsible for land
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*Annex 2 to the Govt. decree 112/2011. (VII. 4.) Korm.*

**Co-authorities contributing to the regulatory proceedings of the HAEA in connection with radioactive waste repositories**

	A	B	C	D
1.	Condition of involvement and contribution	Issue to be addressed	Proceedings	Proceeding co-authority
2.	In the case of a radioactive waste repository	Assessment of the discharge of radioactive materials to the atmosphere and water, protection of the air against radioactive contamination, protection of waters and water reservoirs against radioactive and thermal contamination, and monitoring of the radioactive	licensing of the siting, operation and closure of a radioactive waste repository	Pécs District Authority of Baranya County Government Office proceeding in its environmental protection competence

		contamination of the atmosphere and water environment; determination of monitoring requirements and the system of reports to be submitted to the inspectorate for environmental protection and nature.		
3.	In the case of a radioactive waste repository, if the licensed activity may change the discharges, discharge limit values, the data serving as the basis for the establishment of discharge limit values, control of discharges, environmental monitoring, thermal load in relation to the nuclear facility; may change the place and method of generation, the generated activities, the mode and way of discharge, the activity, activity concentration of physical-chemical properties of the discharged radioactive material, the mass or volume flow rate of discharge, or the planned discharge levels and	Assessment of the discharge of radioactive materials to the atmosphere and water, protection of the air against radioactive contamination, protection of waters and water reservoirs against radioactive and thermal contamination, and monitoring of the radioactive contamination of the atmosphere and water environment; determination of monitoring requirements and the system of reports to be submitted to the inspectorate for environmental protection and nature.	licensing of the modification of a radioactive waste repository	Pécs District Authority of Baranya County Government Office proceeding in its environmental protection competence

	entail the modification of the operation license in relation to the discharged radioactive isotopes and materials.			
4.	In the case of a radioactive waste repository	Assessment of the compliance with geology, mining and engineering safety requirements for the siting and design of radioactive waste repositories. Quantity, type, determination of the use and utilization of mineral source materials planned to be exploited during the construction of the radioactive waste repository, enforcement of mineral asset protection interests, and establishment of mine fee payment obligation.	a) site survey frame programme license, b) site survey license (for phases) c) site license d) construction license, e) operation license, f) closure license	county Government Office proceeding in its mine supervision competence
5.	In proceedings related to the civil structures of the radioactive waste repository, if it has geology impact and if mineral source material is exploited during construction	Assessment of the compliance with geology, mining and engineering safety requirements for the siting and design of radioactive waste	construction (demolition) license, utilization license	county Government Office proceeding in its mine supervision competence



		repositories. Quantity, type, determination of the use and utilization of mineral source materials planned to be exploited during the construction of the radioactive waste repository, enforcement of mineral asset protection interests, and establishment of mine fee payment obligation.		
6.	In the case of modification of the radioactive waste repository, if it has geology impact and if mineral source material is exploited during construction	Assessment of the compliance with geology, mining and engineering safety requirements for the siting and design of radioactive waste repositories. Quantity, type, determination of the use and utilization of mineral source materials planned to be exploited during the construction of the radioactive waste repository, enforcement of mineral asset protection interests, and establishment of mine fee payment obligation.	licensing of the modification of the radioactive waste repository	county Government Office proceeding in its mine supervision competence

7.	Periodic Safety Review Report according to Govt. decree 155/2014. (VI. 30.) Korm.	Assessment of the compliance with geology, mining and engineering safety requirements for the siting and design of radioactive waste repositories.	Regulatory review of the Periodic Safety Review Report	county Government Office proceeding in its mine supervision competence
8.	In the case of a radioactive waste repository	Assessment of the achievability of off-site emergency response measures	a) site survey license (for phases) b) site license c) construction license,	Mol Directorate General for National Disaster Management
9.	Periodic Safety Review Report according to Govt. decree 155/2014. (VI. 30.) Korm	Assessment of the compliance with fire protection related requirements established by the legislation on specific requirements of fire protection related to the use of atomic energy and their enforcement during the activity of the authorities.	Regulatory review of the Periodic Safety Review Report	regionally competent disaster management office
10.	In proceeding aiming at regulatory licensing of buildings and structures in relation to radioactive waste repositories if they have fire protection impact	Assessment of the compliance with fire protection related requirements established by the legislation on specific requirements of fire protection related to the use	a) construction (demolition) license, b) utilization license	regionally competent disaster management office

		of atomic energy and their enforcement during the activity of the authorities.		
11.	Periodic Safety Review Report according to Govt. decree 155/2014. (VI. 30.) Korm	Assessment of the compliance with disaster management related requirements in the Periodic Safety Review Report	Regulatory review of the Periodic Safety Review Report	Mol Directorate General for National Disaster Management
12.	Emergency preparedness and response plan according to the act on atomic energy.	Disaster management related assessment of the plan with regard to the existence and assurance of human and material conditions for the prevention of emergencies, response to and mitigation of consequences, and for effective interventions.	licensing of the emergency response plan	Mol Directorate General for National Disaster Management
13.	Emergency response plan of the transport of radioactive materials according to the ministerial decree on the transport, carriage and packaging of radioactive materials	Disaster management related assessment of the plan with regard to the existence and assurance of human and material conditions for the prevention of emergencies, response to and mitigation of consequences, and for effective interventions.	approval of the emergency response plan	Mol Directorate General for National Disaster Management

14.	Siting, construction of a radioactive waste repository on agricultural land	In relation to the quantitative requirements for the protection of agricultural land.	site license	district (capital district) authority proceeding in real estate competence of the capital and county government office; if the case relates to the territory of more than one district (capital district) authority proceeding in real estate competence then the capital and county government office proceeding in real estate competence
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