The International Atomic Energy Agency’s (IAEA) September 6 report on the situation at the Zaporizhzhia Nuclear Power Plant (ZNPP) described numerous ways in which Russian occupation authorities and the Russian military are jeopardizing the safe operation of the plant. The report does not attempt to determine which party is responsible for the shelling that has damaged the facility and repeatedly calls on “all relevant parties” to take measures to improve the situation. The moderation and apparent neutrality of that language can overshadow the extremely clear articulation of the Russian activities undermining the plant’s safety and the fact that the report attributes no dangerous actions to Ukraine. The IAEA’s report is thus a coded condemnation of Russian moves that have created and are perpetuating the danger of nuclear disaster in Ukraine.

The report specifically notes that Ukraine reported to the IAEA that Russian forces had positioned military equipment in two turbine halls and various other facilities in and around the ZNPP. It adds that the inspection team that finally visited the plant recently directly observed Russian military equipment in turbine halls and elsewhere around the plant. It added that personnel from Russia’s state atomic energy organization, ROSATOM, were at the site and observed that “the presence of Rosatom senior technical staff could lead to interference with the normal lines of operational command or authority and create potential frictions when it comes to decision-making.” It also noted that “the operating staff did not have unrestricted access to some areas, such as the spray cooling ponds, roofs of the buildings, and structures in the area of the water intake, and that access to the cooling ponds area was required to be granted by the military personnel at the site.”

The team visited the alternative emergency center and observed that it lacked “an independent power supply or an independent ventilation system, and there is no internet connection to enable effective communication with all parties involved in an emergency response.”

The IAEA report thus demonstrates that Russian officials have placed military equipment in locations inhibiting access to essential facilities, installed their own personnel to oversee the plant’s operations in ways that the IAEA judges could undermine effective response to a nuclear emergency, restricted the Ukrainian operating staff’s access to key parts of the facility, and shifted the emergency center to a location lacking essential components vital to an effective response to a serious nuclear emergency. The Russians have thus created conditions at the ZNPP that increase the risk that an emergency could occur and significantly increase the danger that the operating staff will be unable to respond efficiently and effectively in such an event.

Russian President Vladimir Putin could seek to use the fears that his actions are causing to coerce the IAEA and the international community into a de facto recognition of Russia’s right to be involved in the operation of the ZNPP, which he might seek to portray as de facto recognition of Russia’s occupation of southern Ukraine. The somewhat coded language of the IAEA report reflects the fact that Ukraine remains the operator of the ZNPP and the party responsible for its safe operation and for complying with the IAEA under international law. The IAEA cannot directly engage Russia regarding the plant’s operation without at least tacitly admitting...
that Russia has some right to be consulted. Putin might seek to take advantage of this situation to attempt to create a process analogous to the Minsk Accords that established the “ceasefire” in Ukraine following Russia’s 2014 invasion. The Minsk and Minsk II agreements treated Russia as a neutral party rather than a participant, thereby tacitly accepting Putin’s assertion that Ukraine was in civil war rather than the victim of Russian aggression. Putin might seek to use the conditions he has created at the ZNPP to establish a parallel international framework undermining Ukraine’s sovereign rights over the much greater expanse of Ukrainian territory Russian forces now occupy.

**Ukrainian forces conducted a counterattack in Kharkiv Oblast near Balakliya that likely drove Russian forces back to the left bank (north side) of the Severskyi Donets and Serednya Balakliika rivers on September 6.** Ukrainian forces likely captured Verbivka (less than 3 km northwest of Balakliya) on September 6.³ Geolocated footage posted on September 6 shows Ukrainian infantry in eastern Verbivka (less than 3 km from Balakliya).⁸ Multiple Russian sources acknowledged Ukrainian gains in Verbivka and reported that Russian forces demolished unspecified bridges in Balakliya’s eastern environs to prevent further Ukrainian advances.⁹ Images posted on September 6 also show a destroyed Russian bridge over the Serednya Balakliika River—a geographic feature behind which the Russian front line in this sector likely lies.¹⁰ Social media users reported that Russian forces withdrew from checkpoints six kilometers west of Balaklia on September 6.¹¹

Russian forces likely no longer maintain their previous positions in Bairak and Nova Husarivka (just south of Balakliya on the right bank of the Seversky Donets River). Russian forces likely abandoned Bayrak and Nova Husarivka in late August. Images posted on August 30 show that Russian forces blew the bridge over the Seversky Donetsk River near Bayrak on an unspecified date.¹² Bridge demolition activity indicates a planned Russian withdrawal. Ukraine’s General Staff reported on September 6 that Russian forces conducted air strikes against Bayrak, indicating that Ukrainian forces may have advanced in the area.¹³

**Russia’s deployment of forces from Kharkiv and eastern Ukraine to Ukraine’s south is likely enabling Ukrainian counterattacks of opportunity.** The September 6 Ukrainian counterattack in Kharkiv was likely an opportunistic effort enabled by the redeployment of Russian forces away from the area to reinforce Russian positions against the Ukrainian counteroffensive in Kherson Oblast. Obituary data on Russian servicemen indicates that Russia deployed elements of the 147th Artillery Regiment of the 2nd Motorized Rifle Division of the 1st Guards Tank Army to Kherson Oblast no earlier than late August.¹⁴ This is the first time ISW has observed elements of Russia’s elite 1st Guards Tank Army operating in southern Ukraine. Elements of the 147th previously fought in Bucha in Kyiv in March and elements of the 1st Guards Tank Army were active primarily along the Kharkiv Axis after the Russian withdrawal from Kyiv.¹⁵

**Key Takeaways**

- The International Atomic Energy Agency report released on September 6 describes Russian activities that increase the likelihood of a nuclear accident at the Zaporizhzhia Nuclear Power Plant while decreasing the ability of the plant’s personnel to respond to such an accident effectively.
- Ukrainian forces have launched likely opportunistic counterattacks in southern Kharkiv Oblast and retaken several settlements. Russian redeployments of forces from this area to defend against the Ukrainian counteroffensive in Kherson likely prompted and facilitated these counterattacks.
- Ukrainian forces are continuing an operational-level interdiction campaign and striking Russian logistics nodes, transportation assets, manpower and equipment concentrations, and control points across Kherson Oblast.
• Russian and Ukrainian sources discussed kinetic activity northwest of Kherson City and in western Kherson Oblast along the Inhulets River.
• Russian forces made incremental gains south of Bakhmut and continued ground attacks north, northwest, and southwest of Donetsk City.
• Russian authorities continue setting conditions to Russify Ukrainians living in Russian-occupied Ukrainian territory.
Assessed Control of Terrain in Ukraine and Main Russian Maneuver Axes as of September 6, 2022, 3:00 PM ET

Map by George Barros, Kateryna Stepanenko, Noel Mikkelsen, and Daniel Mealie
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* Assessed Russian advances are areas where ISW assesses Russian forces have operated in or launched attacks against but do not control.
Ukrainian Counteroffensives (Ukrainian efforts to liberate Russian-occupied territories)

Ukrainian military officials reiterated on September 6 that Ukrainian forces are targeting Russian logistics nodes, transportation assets, manpower and equipment concentrations, and control points across the Southern Axis. Ukraine’s Southern Operational command stated that Ukrainian troops carried out over 150 fire missions in the direction of Kherson Oblast and specifically targeted Russian river crossings in critical areas. The Ukrainian General Staff noted that these Ukrainian strikes are having significant impacts on Russian forces’ ability to conduct offensive operations. Ukrainian officials are maintaining operational silence and did not provide specifics on Ukrainian ground movements in Kherson Oblast.

Social media footage taken by residents of Kherson Oblast on September 6 provides visual evidence of the continuing Ukrainian operational-level interdiction campaign. Ukrainian forces likely struck key Russian logistics nodes and military assets in three main areas on the evening of September 5-6: around Kherson City, in and around Nova Kakhkovka (55km due east of Kherson City), and deep in Russian-held rear areas in southern Kherson Oblast. Social media reports from within the Kherson City area include video claiming to capture the sounds of explosions from a strike on Russian positions in Chornobaivka, on the northern outskirts of Kherson City. Geolocated imagery and satellite imagery from September 5 indicates that Ukrainian strikes likely destroyed the Darivskyi Bridge (about 15km northwest of Kherson City). Residents reported the sounds of explosions after a Ukrainian strike on Russian equipment concentrations in and around Nova Kakhkovka, about 55km due east of Kherson City. Residents also reported explosions and the activation of Russian air defenses over various areas south of the Dnipro River, including Hola Prystan (10km southwest of Kherson City), Kalanchak (65km southeast of Kherson City), and Chaplynka (80km southeast of Kherson City).

Ukrainian and Russian sources reported kinetic activity in two main areas along the Kherson Oblast frontline on September 6—northwest of Kherson City near the Mykolaiv-Kherson border and in western Kherson Oblast along the Inhulets River that runs between Mykolaiv and Kherson Oblasts. The Ukrainian General Staff reported that Ukrainian troops repelled an attempted Russian advance near Lyubomirivka, about 25km northwest of Kherson City. Ukraine’s Southern Operational Command similarly noted that Ukrainian troops fought against Russian assaults near Schmidtove and Ternopi Pody, both about 25km north of Kherson City and along the Mykolaiv-Kherson Oblast border. The frontline northwest of Kherson City is likely highly contested as Ukrainian troops attempt to push inwards toward Kherson City and Russian troops attempt to push outwards towards Mykolaiv City.

Russian milbloggers discussed purported Ukrainian operations in western Kherson along the Inhulets River on September 6. One Russian source reported that Ukrainian forces are transferring reinforcements to the south bank of the Inhulets River but that Ukrainian troops have not been successful in pushing further south that Sukhyi Stavok (about 65km northeast of Kherson City). Russian sources claimed that Ukrainian troops attempted to advance towards Bilohirka (4km northeast of Sukhyi Stavok) from the northwest across the Inhulets River and that fighting is ongoing in Kostromka (4km southeast of Sukhyi Stavok). Russian sources also stated that Russian troops fired on Ukrainian positions around the Sukhyi Stavok pocket, which confirms that Ukrainian forces are holding positions there. Several geolocated videos further confirm that Ukrainian forces have captured territory in northern Kherson near the Dnipropetrovsk Oblast border, namely around Olhyne, Visokopillya, and Novovoznesenske. The Russian Ministry of Defense (MoD) seemingly adopted a more tempered tone in its claims about the Ukrainian counteroffensive on September 6 and stated that Ukrainian troops are continuing...
attempts to attack in the Mykolaiv-Kryvyi Rih direction. Since the start of the counteroffensive of August 29, the prose employed by the Russian MoD has typically been acerbic and intended to undermine Ukrainian actions and present the counteroffensive on whole as a failing. The more neutral tone of the Russian MoD’s September 6 statement may suggest that the Russian MoD seeks to avoid getting too far away from the discourse of Russian milbloggers, who have been reporting specifics of the counteroffensive in granular detail. The Russian MoD likely is unwilling to directly refute concrete claims made by military correspondents, and the more neutral approach to the Ukrainian counteroffensive affords the MoD a margin of error when discussing operations in Kherson Oblast that does not put it too badly at odds with milbloggers in the wider Russian information space.

We do not report in detail on Russian war crimes because those activities are well-covered in Western media and do not directly affect the military operations we are assessing and forecasting. We will continue to evaluate and report on the effects of these criminal activities on the Ukrainian military and population and specifically on combat in Ukrainian urban areas. We utterly condemn these Russian violations of the laws of armed conflict, Geneva Conventions, and humanity even though we do not describe them in these reports.

- Ukrainian Counteroffensives
- Russian Main Effort – Eastern Ukraine (comprised of one subordinate and two supporting efforts);
- Russian Subordinate Main Effort- Capture the entirety of Donetsk Oblast
- Russian Supporting Effort 1- Kharkiv City
- Russian Supporting Effort 2- Southern Axis
- Russian Mobilization and Force Generation Efforts
- Activities in Russian-occupied Areas

**Russian Main Effort- Eastern Ukraine**

**Russian Subordinate Main Effort- Southern Kharkiv and Donetsk Oblast (Russian objective: Capture the entirety of Donetsk Oblast, the claimed territory of Russia’s proxies in Donbas)**

Russian forces did not conduct any confirmed ground attacks along the Izyum-Slovyansk axis on September 6 and continued routine air and artillery strikes in this area. Geolocated footage posted on September 5 shows Ukrainian troops walking freely along a road in Staryi Karavan, about 10km northeast of Slovyansk. The footage suggests that Ukrainian forces may have conducted a limited counterattack northeast of Slovyansk and gained ground near the T0514 highway that runs into Slovyansk itself, or conducted an infiltration reconnaissance mission in the area. Russian forces’ control over Staryi Karavan is likely reduced in either event.

Russian forces did not conduct any confirmed ground attacks toward Siversk on September 6 and continued routine artillery strikes on Siversk and surrounding settlements.

Russian force continued ground attacks south and northeast of Bakhmut on September 6 and made incremental gains south of Bakhmut. Russian sources claimed that Wagner Group fighters established full control over the entirety of Kodema (13km southeast of Bakhmut) by the end of the day on September 6, and a Russian military correspondent posted footage of soldiers moving freely around streets in Kodema. Russian forces will likely use positions in Kodema to push northwards on Zaitseve,
where fighting is ongoing. The Ukrainian General Staff also reported that Russian troops attempted attacks near Vesela Dolyna (5km southeast of Bakhmut) and in Soledar (10km northeast of Bakhmut). Donetsk People’s Republic (DNR) 3rd Brigade claimed they are also advancing from the outskirts of Horlivka (20km south of Bakhmut).

Russian forces conducted a series of ground attacks north, west, and south of the outskirts of Donetsk City on September 6. The Ukrainian General Staff reported that Russian troops conducted assaults near Avdiivka (5km north of the outskirts of Donetsk City), Novobakhmutivka (15km north of the outskirts of Donetsk City), and Spartka and the Butivka mine (both directly on the northern outskirts of Donetsk City). Russian sources claimed that the 11th DNR Regiment took control of a bridge on the road that runs between Pisky and Pervomaiske (both on the northwestern outskirts of Donetsk City) and are continuing efforts to advance westward on Pervomaiske. Ukrainian troops also reportedly repelled Russian attacks in Marinka, on the southwestern outskirts of Donetsk City. Russian troops conducted routine air and artillery strikes along the Avdiivka-Donetsk City frontline.

Russian forces did not conduct any confirmed ground attacks southwest of Donetsk City or in eastern Zaporizhia Oblast on September 6 and continued routine air and artillery strikes in these areas. DNR Territorial Defense claimed that proxy forces, under the cover of Russian artillery fire, took control of Novopil and Vremivka, about 90km southwest of Donetsk City and directly along the Donetsk-Zaporizhia Oblast border. ISW has not observed any evidence of this claim, however.
Assessed Control of Terrain Around Donetsk as of September 6, 2022, 3:00 PM ET

Geolocated footage published on September 4 showed Ukrainian forces operating north of Dolyna.

Geolocated footage posted on September 4 shows Ukrainian forces in Staryi Karavan.

Geolocated footage and sources show Ukrainian forces recapturing Ozerne on September 3.

Geolocated footage published on September 3 showed Russian forces shelling Ukrainian positions north of Yehorivka.

Map by George Barros, Kateryna Stepanenko, Noel Mikkelsen, and Daniel Mealy. © 2022 Institute for the Study of War and AEI's Critical Threats Project.

Legend:
- Significant Fighting in the past 24 Hours
- Assessed Russian-controlled Ukrainian Territory
- Reported Ukrainian Partisan Warfare
- Russian-controlled Ukrainian Territory before February 24
- Claimed Russian Control over Ukrainian Territory
- Assessed Russian Advances in Ukraine*
- Claimed Ukrainian Counteroffensives
- Major Railroads

* Assessed Russian advances are areas where ISW assesses Russian forces have operated in or launched attacks against but do not control.

Note: ISW recessed assessed Russian advances to a poultry farm in eastern Verkhnyokamyanske, Donetsk Oblast, and recessed Russian claimed control layer around Siversk based on geolocated footage published on September 5 that shows Russian forces targeting Ukrainian positions at the poultry farm.
Supporting Effort #1: Kharkiv City (Russian objective: Defend ground lines of communication – GLOCs – to Izyum and prevent Ukrainian forces from reaching the Russian border)

Russian forces did not conduct any confirmed ground attacks in northeastern Kharkiv Oblast on September 6 and continued routine shelling of Kharkiv City and its environs. Russian sources claimed that Ukrainian forces launched an offensive operation on Balakliya (about 65km southeast of Kharkiv City) on September 6. Russian sources claimed that Ukrainian forces gained control of the northwestern part of Verbivka (4km northwest of Balakliya) on the north side of the Krainya Balakliya River. Geolocated video footage from within Verbivka shows Ukrainian soldiers inspecting the bodies of dead Russian soldiers on September 6, indicating that Ukrainian troops have advanced into the settlement. Several Russian milbloggers claimed that heavy fighting is ongoing around Balakliya as Ukrainian troops have reportedly entrenched themselves on the outskirts of the settlement, forcing Russian troops to redeploy reserve troops to the area to support defensive operations. Russian sources voiced their concern that the Ukrainian attack on Balakliya is intended to cut Russian forces off from Izyum and slowly “wedge” into Luhansk Oblast. Ukrainian officials have not yet commented on the progression of Ukrainian offensive operations in Kharkiv Oblast.
Assessed Control of Terrain Around Kharkiv as of September 6, 2022, 3:00 PM ET

Radius of 25 kilometers around Kharkiv (geodesic distance measurement)

Geolocated footage posted on August 28 shows Russian forces in Udy.

Russian sources and geolocated footage indicate Ukrainian forces took control of Verbivka on September 6.

Geolocated footage published on September 3 showed Russian forces shelling Ukrainian positions north of Yehorivka.

Geolocated footage published on September 4 shows Ukrainian forces in Staryi Karavan.

Geolocated footage shows Ukrainian forces recapturing Ozerné on September 3.

Geolocated footage showed Ukrainian forces operating north of Dolya.

Russian forces captured the borders of Luhansk Oblast on July 3.

Russian forces likely consolidated control over Kodema on September 6.

Significant Fighting in the past 24 Hours

Key Ukrainian Roads

Russian Ground Lines of Communication

Russian-controlled Ukrainian Territory before February 24

Claimed Russian Control over Ukrainian Territory

Assessed Russian Advances in Ukraine*

Claimed Ukrainian Counteroffensives

Assessed Russian-controlled Ukrainian Territory

Reported Ukrainian Partisan Warfare

* Assessed Russian advances are areas where ISW assesses Russian forces have operated in or launched attacks against but do not control.

Note: ISW recessed Russian-controlled territory around Pasià based on a Ukrainian General Staff report that Ukrainian forces repelled a Russian assault in the area on September 4. ISW will adjust our maps once more information on Pasià becomes available.
Supporting Effort #2- Southern Axis (Russian objective: Maintain frontline positions and secure rear areas against Ukrainian strikes)

Russian forces did not conduct any confirmed ground attacks in western Zaporizhia Oblast on September 6 and continued routine air and artillery strikes along the line of contact in Zaporizhia Oblast. Russian and Ukrainian sources continued to claim that the other side shelled Enerhodar and the Zaporizhzhia Nuclear Power Plant (ZNPP) throughout the day on September 6. Enerhodar Mayor Dmytro Orlov reported a large explosion that led to a total power and water outage in Enerhodar. Russian sources accused Ukrainian troops of firing at a Russian passport office in Enerhodar.

Russian forces continued routine missile and artillery attacks along the frontlines in Mykolaiv and Dnipropetrovsk Oblasts on September 6.
Assessed Control of Terrain Around Kherson and Mykolaiv as of September 6, 2022, 3:00 PM ET

- **Russian sources claimed Ukrainian forces took control over Blahodatlivka on September 4.**
- **Ukrainian forces may have advanced around Myriolubivka on September 3.**
- **Ukrainian forces took control of Vysokopillya on September 4.**
- **Russian sources claimed Ukrainian forces have control over Petrovka as of September 2.**
- **Geolocated footage posted on September 6 confirms Ukrainian control over Olhyne.**
- Geolocated combat footage posted on September 2 shows Russian forces strike advancing Ukrainian infantry south of Tavriske.

**Significant Fighting in the past 24 Hours**
- Russian-controlled Ukrainian Territory before February 24
- Assessed Russian Advances in Ukraine*
- Assessed Russian-controlled Ukrainian Territory
- Claimed Russian Control over Ukrainian Territory
- Claimed Ukrainian Counteroffensives
- Reported Ukrainian Partisan Warfare

* Assessed Russian advances are areas where ISW assesses Russian forces have operated in or launched attacks against but do not control.

Note: Ukrainian officials announced on August 29 that Ukrainian forces began a counteroffensive in Kherson Oblast. An unnamed military official of an unspecified country told CNN on August 29 that Ukrainian forces liberated Prawdyne, Nova Dmytrivka, and Tomyna Balka (northwest of Kherson City) and Arkhanhelske (along the Inhulets River). ISW will redraft the maps when more open sources confirm the liberation of these settlements. ISW extended Ukrainian counteroffensives to Sukhyi Stavok based on several claims from Russian millbloggers that Ukrainian forces liberated the settlement on August 29. Russian sources claimed that Russian forces pushed Ukrainian forces back to Sukhyi Stavok from Kostromka and Bezimenne on September 3. The Ukrainian General Staff reported that Russian forces launched air strikes on Bezimenne and Kostromka on September 4, which may indicate a Ukrainian advance in the area.

Map by George Barros, Kateryna Stepanenko, Noel Mikkelsen, and Daniel Meddie
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Mobilization and Force Generation Efforts (Russian objective: Expand combat power without conducting general mobilization)

Russian federal subjects (regions) continue to recruit, form, and deploy volunteer battalions to Ukraine. Former Deputy of Perm Oblast’s Legislative Assembly, Alexander Grigorenko, returned to Perm on September 5 after his unspecified volunteer unit deployed to Donbas. Grigorenko’s return to Perm is the first indicator that ISW has observed of the deployment of a Perm Oblast’s volunteer unit to Ukraine. Russian media outlet Kasparov reported that military enlistment offices in Samara Oblast are conducting solicitation calls via phone to invite Samaran reserve officers to enlist for a one-time 300,000-ruble ($4,895) payment and 200,000-ruble ($3,263) monthly salary for volunteer service. Russian media also stated that the ”Murman” rifle company, likely newly formed in Murmansk Oblast and part of the 200th Motorized Rifle Brigade, deployed to Ukraine on September 6 and that the “Komi” motorized rifle company of the Northern Fleet deployed to Ukraine on August 30. Russian outlet TVKOM reported that the formation of the Buryatian ”Baikal” battalion is at about 70 percent (of a planned end strength of 500 men) and that the battalion will deploy to Mulino, Nizhny Novgorod, to undergo training after forming. Chechen Head Ramzan Kadyrov additionally stated on September 6 that the Chechen Republic is preparing “several thousand” more volunteers and fighters for two new elements that will be part of the existing two volunteer Chechen regiments and three battalions generated to fight in Ukraine.
Activity in Russian-occupied Areas (Russian objective: consolidate administrative control of occupied areas; set conditions for potential annexation into the Russian Federation or some other future political arrangement of Moscow’s choosing)

Russian authorities continue setting conditions to Russify Ukrainians living in Russian-occupied Ukrainian territory. LNR Deputy Internal Minister Vitaly Kiselev stated on September 6 that the Kremlin’s ruling United Russia Party helped organize a “rehabilitation course” for Ukrainian children from Donbas with “neuropsychiatric pathologies of varying severity” at the Scientific and Practical Center for Child Psychoneurology of the Moscow City Department of Health. A United Russia official reportedly stated that some parents from Donbas will go to sanatoriums in Dagestan for further “therapy” at the end of September.

Russian occupation authorities continued to face partisan activity in occupied areas on September 6. Ukrainian partisans conducted an improved explosive device attack against Berdyansk city occupation commandant Artem Bardin in Berdyansk on September 6. Russian sources claim that Bardin is alive but in serious condition at a local hospital.
Russian occupation authorities are continuing to prepare for annexation referenda. Russian-appointed Zaporizhia Oblast Military-Civilian Administration Head Vladimir Rogov claimed on September 6 that the “Electoral Commission of Zaporizhia Oblast” is preparing voter lists for the referendum. Rogov stated that voters will vote in stationary booths and voting boxes and that commission members have inspected all polling stations and selected law enforcement officers to safeguard the electoral process. The Russian-backed chairperson of the election commission, Galina Katyushchenko, claimed that the election commission has begun analyzing and correcting voter lists to ensure that “every resident of the region can take part in the expression of will.”

Note: ISW does not receive any classified material from any source, uses only publicly available information, and draws extensively on Russian, Ukrainian, and Western reporting and social media as well as commercially available satellite imagery and other geospatial data as the basis for these reports. References to all sources used are provided in the endnotes of each update.

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5 *ukraine-2ndsummaryreport_sept2022.pdf, p. 15.
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