



Together Against Sizewell C

Deadline 8 Submission TASC IP no. 20026424

TASC comments on ExQ2 responses submitted at deadline 7

Question to ONR: R.2.0

TASC comment:-

ExA asks ONR for the latest information regarding the application for a site licence, any impediments to the granting of such a licence and the timetable for this process.

ONR's responses are prefaced by the statement that, 'To progress its assessment of the licence application, ONR *is implementing a programme of interventions and engagements* aimed at gathering evidence to form a judgement on the capability of NNB GenCo and the effectiveness of its management arrangements...' (emphasis added).

The use of the present tense in this statement indicates that the work is current and therefore no conclusions can yet be drawn in respect of the Applicant's arrangements to:

- develop a capable organisation and have adequate arrangements to provide the necessary organisational capability to safely deliver and oversee the subsequent stages of the project
- develop suitable licence condition compliance arrangements
- ensure adequate plans for development of a safety report that supports the SZC construction, installation, and commissioning programme
- ensure that the site is suitable in terms of its location and characteristics of the population around the site, external hazards, and suitability of the site for engineering and infrastructure requirements of the facility
- comply with relevant conventional safety and nuclear security legislation.

The issues of organisational capability, licence condition compliance, safety and site suitability are then dealt with in a conditional manner with the use of the future tense insofar as most compliance matters are concerned. Only in respect of site suitability is the ONR apparently partially satisfied that conditions have been met in that the proposal conforms to Government siting policy and the location is suitable for the establishment and maintenance of an adequate emergency plan during all phases of the power station.

TASC challenges the ONR's conclusion that the location is suitable for the establishment and maintenance of an adequate emergency plan during 'all phases of the power station.' How can ONR express such confidence when the worst case accident upon which the emergency plan is based is something that is determined by the plant operators themselves and when the detailed emergency planning zone for Sizewell B was determined not by nuclear regulators

but by the local authority Suffolk County Council. We wish to point out that the 1.3 kms inner DEPZ is not to IAEA standards for a Light water reactor. We believe these standards **which have been recently updated by IAEA** still apply to Sizewell B¹.

Further to this, BEIS Emergency planning officers had several times at meetings attended by TASC, endorsed a wish for a DEPZ of 3-5 kms including Leiston IP16 post codes. SCC appear to have failed to discuss wider emergency planning zones up to 30 kms. The local planning authority East Suffolk Council also has failed to limit housing in the evacuation zones. Whilst acknowledging that the emergency planning for Sizewell B is a matter for the Sizewell Stakeholder Group, it is widely believed that the emergency plan developed for Sizewell B is inadequate to ensure the safety of those within the likely deposition area of radioactivity escaping from even a moderate accident by the evacuation of more than a small number of people. We contend that the Suffolk County Council updated evacuation plan² began with the assumption of an unrealistic 1.3 kms DEPZ. This would be compounded by alterations to highways as a consequence of Sizewell C and further disruption to travel routes, all of which terminate at the A12.

Due to personnel changes at SCC and COVID restrictions, it has not proved possible to have a site stakeholder meeting to further discuss Emergency Planning.

It is our opinion that the proposal to construct Sizewell C would massively complicate this already dangerous situation for the Leiston community and those living within the various identified emergency planning zones. The ONR is required to satisfy itself that the location is suitable 'for the establishment and maintenance of an adequate emergency plan *during all phases of the power station*' (emphasis added). TASC maintains that this is an impossible condition for the ONR to satisfy. Quite apart from the additional people occupying new houses being built in the Leiston area, during the 12 – 15 years construction period, the numbers of people potentially requiring evacuation will rise by a minimum of 4,000 workers on the SZC site. During that period of time, Sizewell B will require at least 4 or 5 outages which will add a further 2,000 workers to the pool of vulnerable people potentially in need of evacuation. During the early years of construction, since the Applicant has refused to offer Theberton and Eastbridge mitigation for traffic invasion by constructing the SLR before other site development, most HGV, LGV, bus and car traffic bound for the site will use the B1122 which will also be used by other energy-related projects in the area.

Should Sizewell C ever become operational, there will be three operating reactors in the Sizewell area, two of which generate much hotter and more radioactive fuel carrying far more fission products than even the Sizewell B fuel of which there is around 700 tonnes already in storage on site. Sizewell C will generate over 3500 tonnes of spent nuclear fuel over its lifetime which is also likely to require long-term storage on site. The volume of lethal spent nuclear fuel stored on site at Sizewell is already a significant threat to those living in the vicinity and, in the opinion of TASC, a transgression of the human rights of those living with

¹ <https://www-pub.iaea.org/MTCD/Publications/PDF/Pub1265web.pdf> (See Table 8).

² <https://vectos.co.uk/project/sizewell-evacuation-plan/>

such a long-term de facto nuclear waste store. Sizewell C will add to the complication of the emergency plan and make it all the more improbable to implement in the event of an accident.

We therefore disagree with the ONR when it states that it can be satisfied that the location is suitable for the establishment and maintenance of an adequate emergency plan during all phases of the power station.

ONR goes on to argue that ‘With regard to external hazards, engagement is still ongoing with NNB GenCo in order for ONR to gain confidence in the characterisation of the hazards and to ensure there is no challenge to the suitability of the site.’ TASC believes that the ONR should conclude this engagement to satisfy itself that there is no challenge to the suitability of the site before it announces that, ‘ONR is satisfied with the progress made towards the target of completing its licensing assessment by mid-2022’. Allowing negotiations to continue as if these issues are simply a matter of time and process encourages the impression that they are formalities rather than vitally important considerations. TASC believes that the ONR has an obligation to demonstrate its much-trumpeted independence from government by acknowledging that the site is anything BUT suitable, as it is too small for the proposed development, built on unstable geological foundations, on a rapidly eroding coast which is prone to storm surges and flooding, on the edge of a town of 5500 people, served by roads more suitable for farm and tourist traffic and difficult to reach or to leave in the event of an emergency. The ONR should come to the logical conclusion, no matter how much it feels constrained by the regulator’s code and to its role as an enabler of government policy, that to build a twin EPR reactor power station at the Sizewell site is at best perverse and at worst irresponsible.

TASC note that the ONR’s previous submission at REP2-160 includes information regarding the ONR’s prime requirements for a Justification of Site Suitability Report which includes as a necessity “*adequate cooling capability can be provided for all normal and fault conditions*”. TASC consider that the ExA should seek the ONR’s opinion about the implications of the lack of potable water available to cool SZC’s primary reactor circuits, as recently identified by Northumbrian Water Ltd. TASC are concerned that the ONR do not consider lack of adequate cooling as a potential issue with regard to site licencing.

Question to the Applicant TT.2.12

TASC comment:-

TASC notes with some considerable concern that the Applicant's answer to PINS question TT.2.12 predicts that over the 10 years of peak construction activity, that there will be 467million kilometres travelled by cars/LGVs and 18million kilometres travelled by HGVs/Buses on the SLR/access road i.e. from the A12 to the site.

The huge number of road miles which will be undertaken over such a relatively small road length and in such a contained area clearly gives rise to concerns about the impact on air quality from NOX, PM2.5s and PM10s and, consequently, on human health and the environment. We have asked our air quality expert, Dr Claire Holman, Director of the Air Pollution Services, if she

can assess this impact and she advises that, to do so would require a dispersion model to be run. So, our questions are:

- 1) has EdF carried out such a dispersion model?
- 2) What were the results in terms of dispersal of vehicles (i.e. how many HGVs, LGVs, Buses and cars with what frequency on which roads over what periods of time)?
- 3) What are the impacts on human health in terms of the generation of NOX, PM10s and PM2.5s arising from the data?

TASC appreciate the question relates to an exercise in comparing one route to another but seeing the huge total mileage figures, prompts us to ask the following question:

- 4) how many of the miles calculated are expected to actually be on the B1122 in the early years if the development is allowed to start before the SLR is completed?

The ExA will be aware that the World Health Organisation has just announced its recommendation that the limit for PM2.5 be cut by 50%. The guidelines state levels of particulate matter that are smaller than 2.5 microns ($\mu\text{g}/\text{m}^3$) should not exceed an annual level of $5 \mu\text{g}/\text{m}^3$. Similarly, the recommended limit for NOX has been reduced from 40 to $10 \mu\text{g}/\text{m}^3$.

- 5) Can the Applicant confirm they will be applying the revised WHO limit to the PM2.5s and NOX that will be generated by the SZC project?

Question to the Applicant TT.2.5

TASC comment:-

In the Applicant's response to the question of Darsham Level Crossing Safety Concerns, SZC Co. say they have agreed a Framework Agreement with Network Rail to contribute to the planned improvement. But it says **SZC Co does not regard this as a "requirement" in the sense understood by planning policy** (emphasis added). TASC assumes this means that SZC Co intend to use Darsham park and ride before the safety enhancements to the level crossing.

TASC consider that safety must be a priority and that the ExA must insist that the upgrade of the level crossing is a condition of opening the "Park and Ride". After all, it is the traffic from the "park and ride" that breaks the camel's back and necessitates the crossing upgrade.

Question to the Applicant NV.2.8 Rail noise mitigation

TASC comment:-

In their response, the Applicant states "...and improvements to the rail infrastructure at Saxmundham to avoid the need for stopping (and starting) of trains."

Currently the single line from Saxmundham to Leiston is operated using a "divisible train staff". A "train staff" is a physical object that is handed by the signaller to the train driver as his authority to enter the single line. Exchanging train staffs at speed was outlawed many years ago and trains have to come to a stand to pick up/return the train staff.

Can the Applicant/Network Rail say how eliminating the stopping of trains will be achieved?

Sight of the signalling scheme plan for the Saxmundham track and signalling alterations, have been requested for many months.

When will this be available to the Examination and therefore for public scrutiny?