



Together Against Sizewell C

Deadline 10 Submission TASC IP no. 20026424

TASC comments on ExQ3 response from the Environment Agency submitted at deadline 8

R.3.4 Question to the Environment Agency (and ONR and Applicant)

The Environment Agency's response is set out in REP8-159:

TASC response:

TASC agree with Professor Blowers [REP5-189], in that *“the potential suitability of the site for the management of radioactive waste during operations and far beyond into the future is a matter for the Examination and its scope should not be limited by relying on the evidence of the ONR and the EA.”*

The EA and ONR also confirm this in their joint guidance regarding how flood and coastal erosion risk issues should be taken into account when considering proposals for new build developments- see <https://www.onr.org.uk/documents/2017/principles-for-flood-and-coastal-erosion-risk-management.pdf>

On page 12 it states: *“PINS should be satisfied that the applicant is able to demonstrate suitable flood risk mitigation measures. These mitigation measures should take account of the potential effects of climate change in the most recent marine and coastal flood projections. Applicants should demonstrate that future adaptation/flood mitigation would be achievable at the site, after any power station is built, to allow for any future credible predictions that might arise during the life of the station and the interim spent fuel stores.”*

Given that the UK government has ratified the IPCC AR6 report, TASC concur with Professor Blowers where in his Deadline 7 submission [REP7-169] he states: *“the recent report of the IPCC has a direct bearing on the development of a nuclear power station such as Sizewell C on a coastal location and is relevant to the viability of the site, threatening the decommissioning process and the long-term management of radioactive waste.”*

TASC draw the ExA's attention to page 10 of the EA and ONR joint guidance regarding how flood and coastal erosion risk issues should be taken into account when considering proposals for new build developments: <https://www.onr.org.uk/documents/2017/principles-for-flood-and-coastal-erosion-risk-management.pdf>, where it states that, *“Full life-time of the station – operational life, plus the time taken for the decommissioning and interim storage of spent fuel and waste, prior to disposal. Again, this should be specified and justified by the operator, but is generally understood to be 160 years.”*

The earliest that SZC could reasonably become operational is 2035 so a lifetime of 160 years takes one to 2195. **The Applicant's FRA only extends to 2140 so is therefore clearly inadequate.** TASC have set out more detail on this in our Deadline 10 response to document 9.104 [REP8-125].

TASC consider that, in the light of the Environment Agency/ONR's joint advice above, the EA and ONR should explain why they would be happy to accept a FRA from the Applicant that does not cover the reasonably expected full lifetime of the SZC site.