PROPOSED ESKOM NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE

ENVIRONMENTAL IMPACT ASSESSMENT (EIA: 12/12/20/944)

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT

(Volume RDEIR IRR 3 - 11 May 2011)

Issues have been received from the following stakeholders:

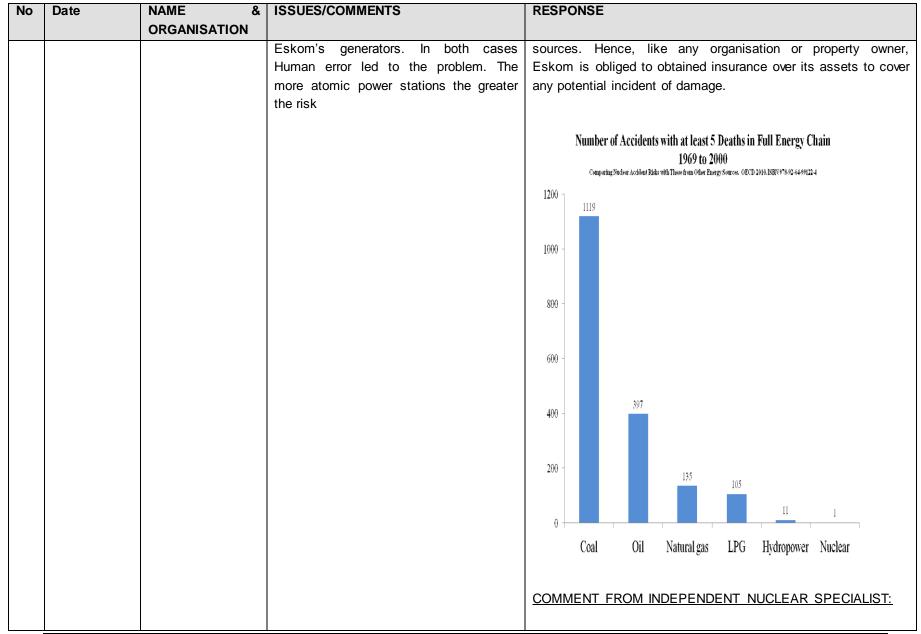
No	Name	Organisation
1	Yushanta Kandasmy	SASKEN
2	Pierre Joubert	Interested Party
3	Eleanor Welsh	Interested Party Interested Party Cape Nature
4	Benjamin Walton & Samantha Ralton	Cape Nature
5	Rodney Anderson Simon Grier	Save Bantamsklip Villiera wines and R. Grier & A. Grier Trust Interested Party (no request for registration)
6	Simon Grier	Villiera wines and R. Grier & A. Grier Trust
7	Keith Gordon	Interested Party (no request for registration)
8	Trudy Malan	Tyspunt Alliance – Project Coordinator

No	Date	NAME &	ISSUES/COMMENTS	RESPONSE
		ORGANISATION		
1	11 May 2011 13:40 Telephone	Yushanta Kandasmy SASKEN	Ms. Kandasmy called on behalf of her client who received the email regarding the Revised Environmental Impact Report (EIR) from a registered Interested	The GIBB Nuclear-1 Public Participation Office informed Ms. Kandasmy that anybody can register to be on the I&AP register and attend the public meetings. She was further informed that all I&APs are invited to complete the comment sheet and
	Call		and Affected Party on the GIBB I&AP register. She did not want to disclose the I&AP nor her client's name. However, she did mention that it is a Chinese company. She also asked about if there is a fee involved to register, who can register and how to go about registering.	forward it to the GIBB Public Participation Office by mail, fax or email. She confirmed that she will speak to her client and they may then make contact directly with the GIBB Nuclear-1 EIA Public Participation Office.
2	11 May 2011 14:25	Pierre Joubert Interested Party	Mr. Joubert requested a map reflecting the new access road/s from Humansdorp to the site.	The GIBB Nuclear-1 Public Participation Office emailed a map to Mr Joubert on 18 May 2011
	Telephone Call			
3	10 May 2011 08:52	Eleanor Welsh	Herewith wish to confirm our telephonic communication on Friday, 6 th May 2011.	Thank you for your comment. In view of the recommended site in the Revised Draft EIR being Thyspunt, the most effort (and thus most meetings around the proposed site) is being invested
	Email		As related to the public meetings schedule for Revised Draft EIR for proposed Nuclear Power Station and Associated Infrastructure as published in the Hermanus Times on 5th May 2011.	in the area around Thyspunt. Thus, only one meeting each has been scheduled for the Bantamsklip and Duynefontein sites in order to give the broader public, especially around the Thyspunt site, the opportunity to participate in the EIA process.
			I draw your attention to the fact that no meeting has been scheduled for Hermanus, which is after all the "capital" of the Overstrand and by far the most densely populated town in the area. We	However, your request for an additional meeting in Hermanus is noted and will be considered.

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			are baffled by the absence of inclusion in the Public Meeting schedule as a lively meeting was held at the Municipal Auditorium in March 2010.	
			In view of the "events in Japan at "FUKUSHIMA" public awareness of the potential dangers of this source of energy has grown and I believe it is incumbent upon ESKOM and their assessors (yourselves) that the broader Public are afforded the opportunity to participate in this process. I trust that this oversight will be rectified and look forward to seeing you in Hermanus.	
4	12 May 2011 08:30	Benjamin Walton Cape Nature	Please register this office as a public I&AP as Organ of State.	GIBB Nuclear-1 Public Participation Office: Cape Nature is registered as an I&AP. An email was sent on 12
		Scientist: Land		May 2011 to request one contact person for Cape Nature. We
	Email	Use Advice	Please submit a physical (hard) copy of the revised draft Environmental Impact	confirm that Cape Nature has requested the following:
			Report and with all specialist reports for consideration, as well as a digital copy for record keeping purposes. Please register this office as a public I&AP as Organ of State.	 Send to Stellenbosch office: Hard copy of Draft Revised Environmental Impact Report (Main Report) Specialist Bio-Physical Reports (Botanical; Zoological; Freshwater and Marine) One digital copy
		Samantha Ralston Cape Nature Land Use Advice: Scientific Services	Apologies for any confusion. Please send the hard copy to this office as per the last round of commenting. Land Use Advice: Scientific Services, P/Bag	 Send to George office: One digital copy for record keeping purposes.

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			X5014, Stellenbosch, 7599.	GIBB will forward digital copies of the report to the Cape Nature George and Stellenbosch offices as requested. A hard copy of the report is available for review at the GIBB Pretoria and Cape Town offices. Please refer below for the physical addresses for each of the GIBB offices: GIBB Pretoria Office –36 Alkantrant Road, Pretoria GIBB Cape Town Office - 14 Kloof Street, Cape Town The report will also be made available on the GIBB project website at the link provided below: http://projects/eskomnuclear1reviseddrafteirversion2
				Hardcopies of the report are available at cost of reproduction and associated administrative time due to the extensive volume of the reports (25 lever arch files, including all appendices). The costs are R25, 000 for a colour copy or R8,000 for a black and white copy.
5	10 May 2011	Rodney Anderson	We confirm that we have received the	Thank you for your comment. Your request for an extension to
	06:15	Save Bantamsklip	documentation with regard to the above matter.	the review period is noted. The request was considered and the comment period will be extended to 07 August 2011.
	Email			
			Your official response has been much	
			delayed and we feel that the return date for our response is too short.	
			Tor our response is too short.	
			You are aware that it is our view that the public participation process is already flawed and that the 45 day time frame is unrealistic and unfair.	

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			We place on record our formal request	
			for an extension to the response period	
			to total 90 days so that we may have the	
			time to be diligent with our comment.	
6	11 May 2011	Simon Grier	No insurance companies will insure an	GIBB Nuclear-1 Public Participation Office:
	14:52	R. Grier & A Grier	Atomic power station or give public	Received comment on comment sheet and then on email. Mr.
		Trust	liability insurance. If we as the public are	Grier was contacted via telephone on 12 May 2011 and he
	Email	Blue Ridge Farm,	not protected there is no way such	confirmed that the faxed copy could be disregarded. The Public
		Stanford	installations should precede.	Participation office also confirmed with him by email on 12 May
				2011 that only the email comments are valid.
		and		
				COMMENT FROM INDEPENDENT NUCLEAR SPECIALIST:
		Villiera Wines		T
				This is factually correct and the NNR is responsible to make the
				determination of the required provision.
			Three of the leading atomic power	Thank you for your comments. With respect to Civil Liability for
			producers and technological leaders in	Nuclear Damage, the NNR Act section 29 requires Eskom to
			the world have had serious problems,	make financial provision for possible damages. Eskom makes
			which they could not control. These	the financial provision through insurance obtained from the
			disasters in America, Russia and Japan	international nuclear insurance pools).
			could not be prevented, nor did the	memational model modulities pools).
			countries have too much idea on how to	COMMENT FROM INDEPENDENT NUCLEAR SPECIALIST:
			control the damage. There is no way	GOWNERY THOM INDET ENDERT TROOLET IN OF EGINEROT.
			South Africa has the ability to deal with a	In addition to what has been said it is not clear which incidents
			disaster of this magnitude.	are being referred to - the assumption is they are TMI,
			a.cac.o. o. this magnitude.	Chernobyl and Fukushima.
				S. S
			South Africa has already had the incident	To put this into context, accidents or incidence do happen
			with the bolt at Koeberg and more	across all industries and manufacturing sectors. The following
			recently the blowing up of one of	graph shows the number of accidents from various energy
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				In terms of each of the above; TMI whilst causing some reactor core damage had only minor actual radiological consequences. However significant lessons have been learned from the event. Similarly Chernobyl whilst having significant off site impact occurred due to a unique combination of reactor design (of a type no longer considered for commercial application) and a particular combination of operational circumstances underpinned by a poor safety culture. Apart from the proposed technology for any reactors in South Africa being not capable of exhibiting the sort of reactor kinetic behaviour, displayed at Chernobyl, the industry as a whole has learned significant lessons from the event - particularly in terms of Safety Culture which has since become an embedded characteristic of nuclear operators world wide. With respect to Fukushima this was due to a unique combination of external events and a reactor design neither of which would specifically feature in the South African context - not withstanding this industry has undertaken stress tests of all facilities against the type of challenges a Fukushima type event would pose and where necessary and as far as reasonably practicable implemented necessary changes. Over and above this reactor operators are required to make appropriate provisions in terms of mitigating beyond design base events and to provide the necessary decision making tools to assist even in the remote event of such occurrences in the form of for example severe accident management guides.
			Radioactive waste is a problem at present and we do not have a solution. The problem will just become greater.	Radioactive waste management practices envisaged for the Nuclear-1 Power Stations are consistent with the IAEA guidelines for a Radioactive Waste Management Programme for nuclear power stations, from generation to disposal. The Nuclear-1 Power Station will further strive to minimise production of all solid, liquid and gaseous radioactive waste,

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				both in terms of volume and activity content, as required for new reactor designs. Systems are lastly designed to store solid radioactive waste for a period of up to three years within the facility. The storage containers are consistent with the requirements for the disposal of solid waste at the radioactive waste disposal facility at Vaalputs. The High-level waste unsuitable for disposal at Vaalputs will be stored safely on site until a suitable facility is available in South Africa. With the implementation of appropriate mitigation measures all potential impacts are expected to be of low significance.
			We do now have green energy solutions. If there is the will from Eskom we will find the way to find the solutions without coal or nuclear. There are still huge potential savings to be made by consumers. Consider this route.	In terms of alternative energy solutions, only a few energy sources capable of providing a sustained power supply are available in sufficient quantities suitable for base-load power supply. Globally, coal and nuclear power are used for base load electricity generation, while in South Africa, the Open Cycle Gas Turbines (OCGTs) (which use liquid fuel such as diesel), two hydroelectric power stations on the Orange River and pumped storage schemes are used for peaking and emergency electricity generation. At present renewable forms
			At present power production is a mess. Public transport, service delivery, roads, schools, hospitals etc. If these basic things cannot be managed how can we embark on something so potentially dangerous? Being told we will not have a problem is no consolation if we know	emergency electricity generation. At present, renewable forms of energy (e.g. wind and solar), are unable to provide viable large scale base load power, or ease of integration into the existing power network in South Africa due to the intermittent supply and lower load factors of these renewable technologies. See for instance, EPRI (2010) referred to in Chapter 5 of the Revised Draft EIR.
			there is no way of dealing with the problem if arises. In addition we will lose everything with no compensation. Break this huge problem down into	In some countries, Internationally, natural gas and hydro power are also used for base-load electricity supply. However, South Africa does not have sufficient quantities of indigenous natural gas and does not have the large rivers required for base load hydro-electric power stations.

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			thousands of small green solutions that ordinary South Africans can handle and will provide our citizens with work.	In light of the above, coal-fired and nuclear power stations are currently the only feasible options in South Africa for base load electricity generation.
				In terms of the management of a nuclear facility, Eskom has a proven track record of effectively managing the Koeberg Nuclear Power Station for more than two decades without any major incident.
7	11 May 2011 07:37	Keith Gordon	I would be most grateful to you if you could let me know what the current status of the nuclear facility that Eskom	Thank you for your comment. Although the Bantamsklip site is not the preferred site in terms of the findings of the Revised Draft EIR for Nuclear-1, this does not exclude the site for
	Email		wishes to erect in the Pearly Beach area.	consideration in terms of Nuclear-2 or Nuclear-3, or any other proposed plants thereafter.
			I am looking to buy property in Pearly Beach but am reticent insofar as the plant is concerned - especially after the incident in Japan recently.	Since the application for Nuclear-1 is for a single power station, new environmental applications would have to be submitted for Nuclear-2 and -3. Alternative sites, in addition to the Bantamsklip site, would need to be assessed in terms of the
			Is there any further discussion on the matter and if so has a resolution been taken?	National Environmental Management Act and its associated EIA Regulations. In other words a full EIA process, including public participation would need to undertaken.
			Will the plant be built in this region or not?	
8	12 May 2011	Trudi Malan	Request for Extention of Time Period	Thank you for your comment. Your request for an extension to
	09:42	Thyspunt Alliance Project	and Focus Group Meetings	the review period and additional focus group meetings is noted. The request for an extension to the review period was
	Email	Coordinator	We would hereby like to request that the time-period for comments on the Revised Draft Environmental Impact	considered and the comment period was extended to 07 August 2011.

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			Assessment for Nuclear 1 be extended	A request for additional engagement with the Squid Scientific
			to 90 days. We believe that the period of	Working Group was also received from Mr Greg Christy (of the
			45 days is too short to allow for adequate	South African Squid Management Industrial Association
			and meaningful public participation.	[SASMIA]) on 13 May 2011. The meeting was scheduled and attended by representatives of SASMIA, the Squid Scientific
			As this is a Revised Draft, we need to be	Working Group, Eskom, Arcus GIBB and the Nuclear-1 Marine
			able to engage with the Project Team in	Ecology Specialists (Prof. Griffiths and Dr. Robinson). The
			order for us to clarify some of the	meetings took place on 20 June, 8 July and 2 August 2011.
			findings in the Revised Draft. We	
			therefore request that the following Key	Lastly, your request for meetings with the Gamtkwa Khoisan
			Focus Group Meetings be arranged	Council as well as selected Nuclear-1 specialist are also noted.
			before 45 days and that another 45 days	GIBB held such a meeting with the Gamtkwa Khoisan Council
			for final comments be allowed after these	during November 2014,
			meetings:	
			 A focus group meeting with the Gamtkwa Khoisan Council. 	
			A focus group meeting with SASMIA and the Scientific Squid Working Croup.	
			Working Group.	
			 A focus group meeting where the role players can directly 	
			engage with the specialists to	
			get a better understanding of	
			some of their findings. It would	
			be meaningful if the following	
			specialists can attend this	
			meeting:	
			Marine Specialists	
			Freshwater Specialist	
			Agricultural Specialist	

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			Economic Specialist	
			Heritage Specialist	
			Social Specialist	
			Transport Specialist	
			Dune Geomorphology	
			Hydrological Specialist	
			Emergency Planning Specialist	
			Although we fully understand the scope	
			of work involved in this project, we	
			believe that it would only be fair to allow	
			all interested and affected parties the	
			opportunity to engage fully with the	
			information presented in the Revised	
			Draft. We have been waiting patiently	
			since July 2010 for both the responses to	
			our comments as well as the revised	
			document.	