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 9 – 07 June 2011)

Issues have been received from the following stakeholders:

No	Name	Organisation
1	Richard Arderne	Pam Golding Properties, St. Francis Bay – Franchisee
2	R Mike Longden-Thurgood	Interested and Affected Party
3	David Le Page	Southern African Faith Communities Environment Institute – Assistant Director
4	David Lipschitz	Software Development and Renewable Energy
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NO	DATE	NAME &	ISSUES / COMMENTS	RESPONSE
		ORGANISATION		
1	25 May 2011 16:44	Richard Arderne Pam Golding Properties, St. Francis Bay	The question below has been asked many times, in the press, at public meeting etc, but I don't think we have ever had a full and comprehensive answer:	Thank you for your comments and your participation in the Environmental Impact Assessment process. Please see our response to your comments below.
	Email	Franchisee	"Why not build the nuclear power station at Coega?" If St. Francis Bay locals understood the answer to this question, I think a lot of unhappiness about the Thyspunt option would dissipate.	The site selection process and the assessment of alternative sites do not include the consideration of Coega as an alternative site and does not fall within the scope of the current EIA process. When the Environmental Application for Nuclear-1 was submitted in 2007 GIBB was informed by the IDZ that there was no space available on the Coega site for the development of a Nuclear Power Station. Furthermore the presence of the Coega fault, which runs across the southern part of the Algoa basin before extending into Algoa Bay near the Coega harbour, means that the Coega IDZ should be considered carefully before proceeding with geological investigations for nuclear siting. In terms of the NNR requirements it is necessary to develop a comprehensive geological data base for the Coega IDZ prior to considering the site for a nuclear power plant, these studies are estimated to take up to 5-6 years. The currently available geological data, indicates that the Coega fault, which represents the easternmost component of a fault line with known Holocene (i.e. the last 11,700 years) reactivation, should be considered to pose a risk with regard to future seismicity. It would therefore be appropriate to include Coega IDZ into the next site screening process which will be initiated for future nuclear sites but for this EIA Coega cannot be regarded as a feasible and reasonable site.
2	25 May 2011 16:51 Email	R Mike Longden- Thurgood Interested and Affected Party	I would have liked to have attended the meeting tonight, but in my 84th year I am sorry that I wasn't particularly enthusiastic to be driving back later - nor would my wife be happy aboutit, either, as she has indicated to me. I trust that you understand. Any daytime meeting would be a different matter. I haven't read through all the revised Draft EIR yet, but certainly through those parts which are especially relevant in view of the near disaster at Fukushima - my comments have already been e-mailed through to you. In view of previous meetings I have attended,	Thank you for your comments. The GIBB Nuclear-1 Public Participation office confirms that a copy of the minutes were sent via e- mail on (06 July 2011

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			I can't really believe that there's anything dramatically new about the situation, now, other than that the nuclear opponents may try and have another go to derail the whole project!	
			I presume that minutes of tonight's meeting will be prepared, which I would obviously be anxious to receive, hopefully with an option to respond, if it's necessary to do so. A timescale for any such response from me can be made as short as a week - even shorter if it's terribly urgent.	
			What I await with particular interest is what reactor Eskom finally decides to select. A decision cannot be delayed for much longer. The signs are a strong preference for the Areva EPR, not the Westinghouse AP-1000, about which I note that the US NRC are still questioning points it, especially the strength of the containment structure, which is going to be a double steel cylindrical shell filled with concrete - I assume with many steel internal cross-links between the two cylindrical shells, substituting for steel concrete reinforcing bars.	The vendor, and hence the specific design of PWR has not yet been decided. This is underwayand is led by Government and as previously stated Eskom has identified an "envelope" that defines the full range of different technologies, in terms of their footprints and the emissions to air, land and water that they may cause.
			As I mentioned in my earlier e-mail, the matter of any design "strengthening" requirements, for example such as would be intended to ensure 100% continuity of electrical supplies otherwise being threatened by tsunami events (which are far less likely to occur in the <i>expanding</i> Atlantic Ocean rather than in the <i>contracting</i> Pacific Ocean with a surrounding seaboard of subduction zones), is not a part of the EIA process, although I have no doubt that questions about it are likely to be raised.	Although not part of the scope of the EIA the likelihood of a tsunami event occurring is discussed in the Oceanographic Assessment (Appendix E16 of the Revised Draft EIR).

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3	27 May 2011	David Le Page	Thank you for your reply, which is completely	Your comment is noted. The choice of venues for the current public
		Southern African	unsatisfactory. Recent events in Japan make	meetings was based on proximity to the alternative sites and the most
	10:17	Faith Communities	It clear, if it were not already, that the area	potentially affected parties, as well as accessibility for the interested
	Email	Institute	at Duynefontein could extend far further than	made to the Draft Environmental Impact Report predominantly relate
		Assistant Director	Melkbosstrand.	to issues specific to the Thyspunt site. Although the current application
			Am I to understand that you will be	Duynefontein and Bantamsklip sites are not recommended as the
			concluding your EIA, for a nuclear power	preferred sites. It is therefore considered that the Public Open Houses
			station at Duynefontein, on the basis of a single public meeting?	and Meetings advertised are sufficient to allow Interested and Affected Parties (I&APs) reasonable opportunity to comment on the key changes to the Draft EIR in this type of forum.
			I would appreciate it if you could please send	
			me a timeline outlining the process for the	This is the reason that Melkbosstrand was chosen as the public
			approval of the site.	meeting venue for the area around the Duynefontein site and the area
			Since I was unable to make the meeting in Melkbosstrand, I would appreciate it if you could also please send me a transcript of those proceedings.	considered but at this point there is no certainty that an additional meetings will be considered but at this point there is no certainty that an additional meeting will take place. Please also note that public meetings were also held as part of the Scoping Phase and the review period in terms of the Draft EIR.
				In terms of the timeline going forward the Revised Draft EIR will be available for public review until 07 August 2011. If any substantive changes are made to report after this period the report will be made available for public review and comment again after which the final report will be submitted to the Department of Environmental Affairs as per the process described on page 7-2 of the Revised Draft EIR
				per une process described on page r-2 or the revised Drait Elix.
				The GIBB Nuclear-1 Public Participation office confirms that a copy of the minutes were sent via e-mail on 23 June 2011

NO	DATE	NAME &	ISSUES / COMMENTS	RESPONSE
		ORGANISATION		
4	27 May 2011 14:02 Email	ORGANISATION David Lipschitz Software Development and Renewable Energy	I have numbers which show that renewable energy will be cheaper than nuclear energy within the next 3 years. So what is the point of building a power station using dirty, old, 20th century, technology. If you'd like me to send you my presentation, please let me know.	Thank you for your comment. The EIA process is a project specific tool and therefore considers the impacts of the proposed development, as per the application for environmental authorisation, on the environment. This EIA therefore does not comment on government policy in terms of future energy planning. It is however important to note that the Integrated Resource Plan 2010 which has been ratified by Cabinet states that:" In addition to all existing and committed power plants (including 10 GW committed coal), the plan includes 9,6 GW of nuclear; 6,3 GW of coal; 17,8 GW of renewables; and 8,9 GW of other generation sources" Also 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. In South Africa, coal, nuclear power and imported hydro power are used for base load electricity generation, while the Open Cycle Gas Turbines (OCGTs) (which use liquid fuel such as diese!), two hydroelectric power stations on the Orange River and pumped storage schemes are used for peaking and emergency electricity generation. At present, renewable forms of energy(e.g. wind and solar), are unable to provide viable large scale base load power due to the intermittent nature of their operation and hence the lower load factors of these renewable technologies. See for instance, EPRI (2010) referred to in Chapter 5 of