## PROPOSED ESKOM NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE

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

## COMMENTS ON DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT

(Volume 22 RDEIR IRR 08 July 2011 - Oysterbay Minutes)

Issues have been received from the following stakeholders:

No	Name	Organisation
1	Bill Trollip	Interested and Affected Party
2	Nick Bormann	Interested and Affected Party
3	Jaco Marks	Interested and Affected Party
4	Johan Strydom	Interested and Affected Party
5	Jonathan Biko	Interested and Affected Party
6	Sini	Interested and Affected Party
7	Unidentified	Interested and Affected Party
8	Mizandi	Interested and Affected Party
9	Joseph Williams	Interested and Affected Party
10	Zolani Maluni	Interested and Affected Party
11	Nick Walman	Interested and Affected Party
12	Unidentified	Interested and Affected Party
13	llse van Lingen	DA Member of Parliament
14	Philemon Mafikeng	Interested and Affected Party
15	Joseph Williams	Interested and Affected Party
16	Unidentified	Interested and Affected Party
17	Unidentified	Interested and Affected Party

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1		Bill Trollip Interested and Affected Party	Until such time as the authorities choose what type of reactor is going to be installed, this whole assessment is a waste of time.  For the simple reason that there are American, Japanese, Chinese, Korean, Russian and French reactors and each and everyone of them will have a different approach to the way they want it built. For example to bury it or not and the exact location. Surely a decision in this regard would be firstly required. Furthermore, where we are going to get the equipment from and what would the vendor's input be into the situation.	Unfortunately, one does not usually have the detailed plan and design of a proposed development when undertaking an Environmental Impact Assessment. The methodology that was used was that a consistent dataset was compiled by Eskom based on all pressurised water reactor plant types available internationally by various vendors.  This is a conservative set of criteria that encompasses all the aspects of a nuclear power plant that potentially impacts the environment. If the proposed plant is authorised these criteria would be mandatory for potential vendors.
2		Nick Bormann (Oyster Bay resident)	The main concern for the people of Oyster Bay is the westerly access road that stretches between the Oyster Bay Community Hall and Umzamuwethu.  Therefore, I think that the main concern is the noise. Especially, if you are talking about 600 plus vehicles, trucks and busses proposed to travel on this road. Why can we not look at the blue route as an alternative seeing that the noise factor is such a great concern for the residents of	It was previously mentioned that the Oyster Bay mobile dune system is regarded by the biophysical specialists as very sensitive. For this reason GIBB has recommended that further impact on the dune system should be avoided. For similar reasons the proposed northern access road was found not to be acceptable.  The Transport Assessment Report was substantively amended and the feasibility of the western access road was re-assessed. The revised report recommends that a combination of both Oyster Bay Road (Route 1 to western access) and R330 (Route 2 to eastern access) be used for transportation during the construction phase, which will improve the impact on traffic congestion, noise and safety to
			alternative seeing that the noise factor is such a great concern for the residents of Oysterbay?	transportation during the construction phase, which improve the impact on traffic congestion, noise and safe low / medium. The construction vehicles (normal h loads) will utilise only the upgraded Oyster Bay F

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				(DR1763 - western access) to minimise the impact of construction traffic on the existing network and the infrequent abnormal loads will utilise the R330 (MR381) during the night time. Several bypasses have been recommended for construction traffic to avoid using the Humansdorp Main Street travelling between the N2 and the Oyster Bay Road, as well as to avoid the Humansdorp Main Street to travel between Voortrekker Road (R102) and the R330.  A Noise Impact Assessment was completed as part of the Environmental Impact Assessment and looking specifically to the noise adjacent to Umzamuwethu. The Noise Specialist came to the conclusion that the most significant source of noise would come from the Open Cycle Gas Turbine¹ plant that would operate at erratic intervals, from the high voltage yard situated north of the dune system. The noise would have to be mitigated to avoid undesirable noise impacts to residents of areas like Umzamuwethu.
3		Jaco Marks Interested and Affected Party	Why can the blue road access route not be connected midway with the purple route. If you connect these two roads then you would miss all the sensitive dunes.	The dunes that would need to be traversed are hardened calcareous dune ridges and valley slacks and although the dunes look like degraded veldt they are fairly sensitive in terms of vegetation communities. This fact has been highlighted by the Flora Specialist. When there is sensitive vegetation communities there are likely to be vertebrate and invertebrates as well.  The specialists did not look at the mentioned crossing of the Oyster Bay Headland Bypass Dunes specifically. However, this crossing is unlikely to be feasible when one takes in

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				consideration the Biophysical Specialists views. This would need to be investigated further.
			Currently the road is not being maintained by the local government and the impact on the road will probably increase three hundred times. Thus the question is who is going to maintain the road? The road is not maintained by the government and the question remains who is going to keep the road in good condition.	The Transport Assessment Report was substantively amended and the feasibility of the western access road was re-assessed. The revised report recommends that a combination of both Oyster Bay Road (Route 1 to western access) and R330 (Route 2 to eastern access) be used for transportation during the construction phase, which will improve the impact on traffic congestion, noise and safety to low / medium. The construction vehicles (normal heavy loads) will utilise only the upgraded Oyster Bay Road (DR1763 - western access) to minimise the impact of construction traffic on the existing network and the infrequent abnormal loads will utilise the R330 (MR381) during the night time. Several bypasses have been recommended for construction traffic to avoid using the Humansdorp Main Street travelling between the N2 and the Oyster Bay Road, as well as to avoid the Humansdorp Main Street to travel between Voortrekker Road (R102) and the R330.
				It is built in the EIA that the Applicant (i.e. Eskom) would need to maintain the road in the condition it is found before the commencement of construction.
				The road is currently not in a good condition and thus it is not feasible for Eskom to use the road in its current condition. It is noted in the Environmental Impact Report (EIR) that Eskom would need to bring the road up to feasible standard. During the first nine years of the construction

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				period Eskom would be completely responsible for the
				maintenance of the access roads to the site.
4		Johan Strydom	This question is for Eskom. If the blue road	One of the key recommendations to Eskom in the Revised
		(Oyster Bay	access route is no longer being considered,	Draft EIR version 1 is that they are required to acquire extra
		resident)	why was Eskom still buying farmland on this	land to ensure that areas such as wetlands (which are
			route, as late as 2010?	currently degraded) can be rehabilitated and conserved.
				Eskom is in the process of buying additional properties at
				their own risk, knowing full well that the Thyspunt site may
				not be authorised. Particular parcels of land and wetlands
				have been identified for acquisition and conservation.
5		Jonathan Biko	I heard about the discussions,	The recommendation of the EIA is that 25% of all
		(Umzamuwethu	assessments, the roads and what was	employment needs to go to local people. Furthermore, one
		resident)	already done. Also, I heard about the	needs to bear in mind that the 7 700 figure that was
		,	number of employees that will be on site.	mentioned, is only applicable to employment for the peak
				years of construction. Highly skilled jobs would have to be
			Is Eskom going to develop the people of the	recruited from outside. However, unskilled labour would be
			disadvantaged communities that are sitting	employed locally.
			right on the doorstep of this proposed	
			nuclear power station?	In terms of the Medupi Power Station project there was a
				strike in June 2011 for several days. The strike was mostly
			I have seen on the TV news about what is	about foreign welders that were brought in from Thailand.
			happening in Medupi. What is Eskom going to do to avoid what happened in Medupi, at	There is a general shortage of welders in South Africa therefore welders from others countries are recruited on
			the proposed nuclear power station?	large construction projects. Eskom has established a
			the proposed huclear power station:	process to train specialist welders over the next few years.
			Eskom is employing people from other	Many local people were trained during the construction of
			areas that are not living close to the project	the Medupi Power Station. People are given general training
			because the local community are unskilled,	during the construction phase and others who have Matric or
			un-educated and suitable for skilled jobs.	have completed school are trained in positions as operators
			What is Eskom going to do to alleviate this	at the plants. Therefore when operations commence these
			problem?	people are already trained. The idea is to try to train local

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		ORGANISATION	What is happening to avoid employing people from far away and not employing people from close by?  As black people we are just taken as workaholics or wheelbarrow labour but lucrative tenders are given to white people whose been opposing this proposed nuclear plant. However, now that they (white people) realise that the nuclear plant is coming to us, Eskom is offering the tenders to them. The white people then go to the townships to gather people for the job.	people to operate the power station. Eskom's intention with the new nuclear station is similar.  Eskom is very serious about ensuring that local, previously disadvantaged communities do get opportunities. The tenders referred to in the meeting are related to land management and removal of invasive plants. Eskom has to follow the commercial processes, this requires that people are registered on the Eskom data base so that when the tender goes out they can be part of the tender process. Eskom has had meetings with local Business Forums and hope that they will assist in identifying people and companies that can register on the Eskom database.
			The request is that they must also be considered when Eskom requirements are not for highly skilled people.  An example is that tenders are given to currently to white people on site even though the requirements are not for such	
			highly skilled people but not given to them because they are black. Tenders are only given to white people.	
6		Sini (Surname unidentified) (Umzamuwethu resident)	Tired of the political twist and turns.	Your comment is noted.

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7		Unidentified I&AP (Oyster Bay resident)	I attended one of the EIA meetings last year in March and made a comment that was not minuted. In my opinion, if I had the time to follow-up and was paid what I believe I am worth then I would have challenged the case and tried to rectify the matter. The reason I am standing up today is that there is definitely a bit of a political twist to these things invariably. However, the government has done an enormous amount to enable people to receive training.	The meeting held in Oyster Bay on 08 July 2011 was called to discuss and debate the Revised Environmental Impact Report version 1 and issues beyond this will not be debated.
8		Mizandi (Surname unidentified) (Umzamuwethu resident)	I am very disappointed because Eskom is taking so long to get started and the people from Umzamuwethu are looking forward to the proposed development.  What is Eskom's responsibility in terms of monitoring victimisation of the workers? What is going on?  Eskom is already in bed with some popular public person as they are working on the tender already.  I also heard about the training that Eskom is going to provide. We need the date when the scheduled training will commence.  The majority of people need the development and Eskom should keep this in mind.	Eskom does not know when the Government would approve the proposed Nuclear-1, and indeed if they would approve it. The appointed Vendor would undergo the standard tender procurement process and would be responsible for the development of local skills.  Eskom is currently not engaging in any tendering processes. This will only be done once the project is approved by the authorities. Once the project is approved Eskom and its contractors will be responsible to put in place training programmes which will develop basic skills and enable locals to participate. Eskom has ongoing programmes to develop learners. Engineers and learner technicians are a specific focus. Eskom can be contacted for more information. 0118008111

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9		Joseph Williams Interested and Affected Party	I refer to the access road indicated with the pink line that cuts through Umzamuwethu and Oyster Bay. People move across this road. Also, people work in Oyster Bay and live in Umzamuwethu. People from Umzamuwethu also go to the beach in Oyster Bay. What are the safety standards that will be in position when the road is actually in use?	There is definitely a concern for pedestrians crossing the access roads, especially around the Humansdorp, Sea Vista and Umzamuwethu areas. Therefore, traffic specialists recommended either an overpass or underpass be used in these situations. Hundreds of vehicles will be travelling on these roads and thus the overpass or underpass will be required to alleviate safety concerns.
10		Zolani Maluni (Umzamuwethu resident)	Is Thyspunt a suitable site for a nuclear power plant?	Three sites (Thyspunt, Bantamklip and Dynefontein) were assessed and recommended as being the most suitable for Nuclear-1. The site selection process preceded the EIA in the form of the Nuclear Site Investigation Programme. Suitable alternative sites for the construction of a nuclear power station were independently researched in the 1980s.
			Are you working hand in hand with the local municipality for any deals or community trustees?	Eskom has engaged with the local authorities. This engagement would increase from now on and will become more concentrated as the certainty that this site will be authorised grows.
			During that time of the elections many people were victimised at the site where they were cutting bushes.	
			If the nuclear plant is sustainable on the Thyspunt site then it should happen sooner rather than later. We need to emphasise we are for nuclear but if beneficial to the community.	Comment noted.
			Before the construction site commences the	Comment noted.

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			houses first need to be built and this is	
			going to help us.	
			Everybody is looking at Eskom and asking when are they going to do that.  When is it going to happen?	There are several authorisations that are required prior to this site being confirmed as the first site for a nuclear power stations. The Department of Energy and Eskom are working together to determine the process to be followed. It is hoped that this process will enable the tender process for the main vendor to commence as soon as possible. October 2012: discussions are continuing but no specific timelines have been determined.
11		Nick Walman Interested and Affected Party	Will the 6 km exclusion zone around the nuclear power station exclude other development? What happened to that? I know it was reduced to 1 km but since then it has sort of disappeared.	There were larger exclusion zones in the early Scoping Phase. The design of the nuclear power station has changed and the exclusion zone is now based on international recommendations. The smallest exclusion zone is 800 m and no private development is allowed within this. Secondly there is a zone of 3 km within which there will be restrictions on future development. The owner controlled zone of Eskom is within 2 km of the power station, but is not required by legislation and is governed by Eskom's internal policies.
12		Unidentified I&AP (Oyster Bay resident)	The road will become a lot busier. Thus the question is what the impact will be on tourism in the area.  Furthermore, is the nuclear power station specifically going to have an impact on the tourism in the area? If increase of vehicles on roads, what impact will this have on tourism?	The Tourism Impact Assessment formed part of the Economic Report (Appendix E17 for the Revised Draft EIR Version 1) and it was found that the highest potential negative impact on tourism could occur at the Thyspunt site. The impact on tourism has been quantified in bed nights and the negative or positive impacts of the proposed power station have been predicted during construction and operation. He added, however, that it has been the experience at other power stations such as the Medupi

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			What is the impact going to be on tourism if nuclear plant is built in this area?	Power Station that local business-based tourism can increase substantially as a result of the influx of Eskom employees and contractors.
13		Ilse van Lingen (Resident of St. Francis Bay and DA Member of Parliament)	The International Atomic Energy Institute (IAEI) told them through the NNR in parliament that the safety zones are not being deviated from the 16 km, 30 km or 50 km zones. This is according to the European standard which is not approved by the IAEA. This is what the manufacturers reckon is safe because they want to pass or get their product sold. This is not correct and we are investigating the correct information through IAEA at the moment. We must not believe what we see here.	There are no internationals norms and standards on the exclusion zone. The European Utilities standards recommend the 800 m and 3 km zones, the NNR in parliament indicated that they would consider changes to the emergency zones. Each site is studied and the emergency planning zones are confirmed based on these studies. Eskom has assumed the EUR standards based on the safety of the technology proposed for the plant.
			We must not confuse emergency planning zones with international standards and land ownership. We must understand that it has got to do with exit and safety routes to get out in case of an emergency.	Emergency Response studies were undertaken as part of the EIA process. The Emergency Response report forms Appendix E26 of the Revised Draft EIR Version 1. The studies found that it is feasible to develop and implement an emergency plan based on the EUR requirements; however, the proposed radii are still to be agreed with the National Nuclear Regulator based on technical arguments. This will further be confirmed once the design has been selected.  COMMENT FROM INDEPENDENT NUCLEAR SPECIALIST:  Agreed the proposed arrangements are based on best practice however definitive situation can only be determined

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				as part of the licensing application and process
14		Philemon Mafikeng Interested and Affected Party	Eskom said it has a skills development project. The question is why can you not develop the people's skills before the start of the power station?	
			Last year the community asked Eskom if they can give to the primary school in Umzamuwethu. Please advise if this is still on track.	Eskom Development was asked to look at how to assist the Umzamuwethu school. GIBB cannot guarantee what Eskom Development Foundation will be able to contribute, but they have visited the site and submitted a proposal.
15		Joseph Williams Interested and Affected Party	Where is Umzamuwethu located in this control zone and will Umzamuwethu have space to grow as a community?	The largest control zone is 3 km. Oyster Bay is about 5 km from proposed nuclear plant. Thus Oyster Bay and Umzamuwethu fall outside the control zone.
16		Unidentified I&AP (Umzamuwethu resident)	I was one of the people that went to the Koeberg Nuclear Power Station last year in September. I would prefer that Eskom and GIBB not confuse the community. They are saying 5.5 km and that Umzamuwethu is outside the zone.	There are different types of reactors. The Koeberg Nuclear Power Station was built in 1970s when nuclear reactors required larger emergency planning zones compared to today. The newer nuclear plant designs require much smaller emergency zones.
17		Unidentified I&AP Interested and Affected Party	Where will the waste generated at the nuclear plant be taken?	There are three types of waste that require different forms of disposal. There is only one nuclear waste disposal site in the Northern Cape called Vaalputs Waste Disposal Site. Low and intermediate level waste would be transported to this site in special containers. A special license is also required for radioactive waste transport. The third type of waste is high level waste. It is managed under very controlled

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				conditions and is kept on the site of the nuclear power station for the life time of the power station (i.e. 60 years).