PROPOSED ESKOM NUCLEAR POWER STATION
AND ASSOCIATED INFRASTRUCTURE

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

COMMENTS ON
DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT

(Volume 51 RDEIR IRR 04 August 2011)

Issues have been received from the following stakeholders:

No	Name	Organisation
1	Antony & Mary Yoell	Interested and Affected Parties
2	Richard Lorton	Interested and Affected Party
3	Dawid A Reynders	Interested and Affected Party
4	Eric Mair	African Alternative Technologies
5	Sally Andrew and Bowen Boshier	Interested and Affected Parties

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1	08 August 2011 Email	Antony and Mary Yoell Interested and Affected Parties	Many thanks for forwarding the Minutes of the last Public Meeting held in St Francis Bay in May. We note from the minutes that you are planning to re-look at the access route to the Thyspunt site. We were extremely concerned to hear at the meeting that the R330 from Humansdorp is the preferred routing and that no up-grade or widening of the road was considered necessary. We are sure that in view of the recent collapse of the main road over the Sand River, your Roads specialist will be reviewing his opinion that this road would not require any up-grade for extra heavy transport! As you are no doubt aware, this is the second wash away of the R330 - the first being in 2007. We do understand that there has been an assurance that no heavy vehicles will be allowed to use the road during peak times. However, this road is a busy road for business vehicles, delivery trucks, school buses and residents of St Francis Bay, Cape St Francis and Oyster Bay at all times during the day. It will become totally impossible if this road becomes jammed with hundreds of heavy construction vehicles. The proposed route will pass two schools, an extensive residential area	Your comments are noted. The Transportation Specialist Study has been revised and will be made available for public comment and review as part of the Revised Draft EIR Version 2. The revised specialist study acknowledges that the Thyspunt site requires significant transport infrastructure upgrades. The R330 is now proposed to be used for light vehicle traffic and abnormal load transport, and sections will require upgrading for this purpose. The Oyster Bay Road is now proposed to be upgraded to a surfaced road to be used during the construction and operational phases for staff access, light vehicle traffic, heavy vehicle traffic and as an emergency evacuation route for areas such as Oyster Bay. DR1762, which links the R330 and Oyster Bay Road is now proposed to be surfaced to provide improved east-west connectivity. Bypass roads to the East and West of Humansdorp are also now proposed to be constructed to reduce the traffic impact on central Humansdorp.

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			bordering the R330 and the noise and disruption to the local community will be considerable. It will also become an extremely dangerous road as drivers will become frustrated sitting behind queues of slow moving construction vehicles. May we urge you to please look at an alternative route to this for access to the Thyspunt site as the impact on all residents of St Francis Bay, Sea Vista and Cape St Francis will be very high?	
2	02 August 2011 Email	Richard Lorton Interested and Affected Party	I feel that the selection of the sites is flawed. The selection criteria seems to solely be based on sites that ESKOM bought and owned many years ago when environmental and social considerations were not high on the agenda i.e. they are "previous regime" selections. The general public needs to be convinced that there are no other environmentally and socially more acceptable sites regardless if these have to be purchased or subjected to expropriation procedures. The draft report is not convincing in this respect. In fact the report emphasises the environmental	Thank you for your comments. A difficulty in terms of the identification of potential sites for the location of a Nuclear Power Station is that demand for electricity in South Africa varies spatially (geographic) and temporally (with time) and areas of high electricity demand (such as the Eastern Cape) are not correlated with current power generation centres in South Africa. The Nuclear Site Investigation Programme (NSIP) therefore aimed at identifying the most suitable sites for location of Nuclear Power Stations in South Africa (within the context of the statement above) and included a wide range of specialist studies, such as engineering, social science, geology, ecology and town planning. The primary objective was to identify sites along the coastline of South Africa, suitable for the construction and operation of future Nuclear Power Stations. Thus although the choice of the original five and later three sites are based on the NSIP study undertaken by independent consultants during the 1980s, the outcome of the NSIP is still applicable to the complexities described above.

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			sensitivity of the sites.	It cannot however reasonably be expected from the Environmental Impact Assessment (EIA) process to duplicate the work of the NSIP, as the EIA process is seen as an Integrated Environmental Management tool used to assess the specific significance of the impact of the proposed development of the Nuclear-1 Power Station on the Duynefontein, Bantamsklip and Thyspunt sites. Please refer to chapter 5 of this EIR for further information on the sites assessed as part of the EIA process.
3	02 August 2011 Email	Dawid A Reynders Interested and Affected Party	Impak van kern- en nie-kernafval *(Impact from nuclear and non-nuclear waste)* From reading the above paragraph I would like to request further information about how the storage of radioactive material actually takes place. In research I have done, it appears that there is no real determined way yet to permanently dispose of nuclear waste, since even the containers that the waste is stored in will corrode over time and leak the radioactive material into the environment. There are no long term studies to prove safety in this case. We are planning to build seven new nuclear power stations, without proper tested and proven knowledge of how to dispose of materials that could	Thank you for your comments. It is acknowledged that the issues of radioactive waste management is important and integral to debate surrounding nuclear energy and as stated in Section 3.17 of the Revised Draft EIR Version 2, the only alternative currently available in South Africa is long-term storage of the spent fuel in the nuclear power station. Provision is made to store compacted waste on site for up to three years, but normally, waste will be removed to Vaalputs every year. The concept for the disposal of solid waste at Vaalputs consists of near surface trenches using metal containers for low-level waste and concrete containers for intermediate level waste. The long-term safety of the facility, which complies with international best practices for the disposal of low and intermediate level waste, has been demonstrated for a national inventory of radioactive waste. The inventory derived for this purpose, included waste of the proposed Nuclear-1 Nuclear Power Station. Vaalputs therefore has more than enough capacity to dispose of the solid waste estimated to be generated by the Nuclear-1 Nuclear Power Station (refer to the Management of Radiological Waste Report which forms part of the revised EIR Version 2 (Appendix E29) Which will be made available for public review.

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			threaten our environment and life in South Africa.	Please note that a Radioactive Waste Management Institute has recently been legislated. One of the functions of this institute is to identify a repository for high level waste in South Africa. Highly radioactive waste are emplaced in stainless steel containers/ canisters which are corrosion resistant and their design lives are approximately 40-50 years. Thereafter direct disposal or reprocessing can be considered. Geotechnical direct disposal facilities are being implemented in Finland and Sweden
4	02 August 2011 Email	Eric Mair African Alternative Technologies	Just to make sure you have this message loud and clear. There is no need to expose ourselves to any of the risks involved in nuclear power. Renewable sources of energy are available, more than we will probably ever need, and we have the technology to convert those resources into usable power. Please do the sensible thing and advise your client he should rethink his nuclear strategy.	Thank comments and concerns are noted. There are indeed many technologies (including alternative/renewable energy sources) which could be employed to generate energy to meet South Africa's current and future energy demand. The choice of technologies and the weighting to be given to each in terms of addressing South Africa's energy requirements however does not fall within the ambit of this Environmental Impact Assessment (EIA) to address. It falls within the ambit of strategic government initiatives such as the Integrated Resources Plan 2010 (IRP 2010). It should therefore be noted that as determined in the IRP 2010 nuclear and renewable technology are both an important component of South Africa's future energy mix. No single source of power can however provide in South Africa's need for an additional 20 000 MW of additional capacity by 2020 and a mixture of sources, including wind power and nuclear power, has been recommended in the approved IRP 2010. The assessment of nuclear safety risks lastly are outside the scope of the EIA process and will be considered in the National Nuclear Regulator's licensing process. Please refer in this regard to the Co-operative Governance Agreement included in Appendix B4 of the Revised Draft EIR.

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5	02 August 2011 Email	Sally Andrew and Bowen Boshier Interested and Affected Parties	All our objections still stand. None of our concerns (outlined in previous correspondence) have been adequately addressed	Your comment is noted. All correspondence received from yourselves during this EIA process and responses thereto have been and will be included in the documentation submitted to the Competent Authority for their review and decision.

Yours faithfully

For GIBB (Pty) Ltd
The Nuclear-1 EIA Team