

ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED  
USED FUEL TRANSIENT INTERIM STORAGE FACILITY  
AT KOEBERG NUCLEAR POWER STATION

SRK PROJECT NO: 478317

STAKEHOLDER REGISTRATION AND COMMENT FORM

Please complete and submit this form by hand, post, fax or email to:

SRK Consulting

Jessica du Toit

The Administrative Building, Albion Springs, 183 Main Road, Rondebosch, 7700

Postnet Suite #206, Private Bag X18, Rondebosch, 7701

Fax: 021 685 7105 Tel: 021 659 3060,

E-mail: jedutoit@srk.co.za

PLEASE PRINT CLEARLY

TO REGISTER AS A STAKEHOLDER:

Name: Bettie leedo Date: 9/10/2015

Organisation (if any): City of Cape Town

Capacity (if applicable): Environmental Health : Western District.

Postal address: \_\_\_\_\_

Postal code: \_\_\_\_\_

Telephone number: \_\_\_\_\_ Fax number: 021 511 9030

E-mail: Bettie.leedo@capetown.gov.za

Preferred communication method (email / fax / post): email

Please indicate any direct business, financial, personal or other interest that you may have in the application:

Prevention of contamination to surrounding neighbourhoods.

Any initial comments or concerns that you may have regarding the proposed project can be indicated below and/or on a separate page:

1. period of storage on site
2. prevention of ground contamination
3. Why is CISF assumed unavailable for use by 2025?

**SCIENTIFIC SERVICES**

**postal** Private Bag X5014 Stellenbosch 7599  
**physical** Assegaaibosch Nature Reserve Jonkershoek  
**website** www.capenature.co.za  
**enquiries** Rhett Smart  
**telephone** +27 21 866 8017 **fax** +27 21 866 1523  
**email** rsmart@capenature.co.za  
**reference** SSD14/2/6/1/4/1/34\_waste storage\_Koeberg  
**date** 9 November 2015

SRK Consulting  
Postnet Suite 206  
Private Bag X18  
Rondebosch  
7701

Attention: Jessica du Toit  
By email: [jedutoit@srk.co.za](mailto:jedutoit@srk.co.za)

Dear Jessica

**Background Information Document for the Proposed Used Fuel Transient Interim Storage Facility at Koeberg Nuclear Power Station, Cape Town**

CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

The proposed facility will be placed on a concrete slab within the existing designated operational area of the existing nuclear power station. It is assumed that any natural vegetation within the footprint of the two proposed alternatives would already be impacted by the activities related to the adjacent power station, however CapeNature will comment further once a description is provided in the Draft Scoping Report. The proposed activities could also impact on coastal processes due to the proximity to the coastline.

It is assumed that the proposed development will include specialist studies related to health and safety risk. These studies should also include the natural environment as potential affected components within these studies.

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely



**Rhett Smart**  
**For: Manager (Scientific Services)**

ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED  
USED FUEL TRANSIENT INTERIM STORAGE FACILITY  
AT KOEBERG NUCLEAR POWER STATION

SRK PROJECT NO: 478317

STAKEHOLDER REGISTRATION AND COMMENT FORM

Please complete and submit this form by hand, post, fax or email to:

SRK Consulting

Jessica du Toit

The Administrative Building, Albion Springs, 183 Main Road, Rondebosch, 7700

Postnet Suite #206, Private Bag X18, Rondebosch, 7701

Fax: 021 685 7105 Tel: 021 659 3060,

E-mail: jedutoit@srk.co.za

PLEASE PRINT CLEARLY

TO REGISTER AS A STAKEHOLDER:

Name: GRAHAM MBUCKLE Date: 27/10/2015

Organisation (if any): —

Capacity (if applicable): —

Postal address: PO BOX 382, MELKBOSSTRAND

Postal code: 7437

Telephone number: 021-553-5623 Fax number: —

E-mail: graham@nimblemouse.co.za

Preferred communication method (email / fax / post): EMAIL

Please indicate any direct business, financial, personal or other interest that you may have in the application:

LANDOWNER, NEIGHBOURING KOEBERG NUCLEAR POWER STATION

Any initial comments or concerns that you may have regarding the proposed project can be indicated below and/or on a separate page:

- ① - REQUIRE COMPREHENSIVE RISK ASSESSMENT ~~REQUIRED~~, INCLUDING ~~CON~~ CONSEQUENTIAL RISKS & CUMULATIVE RISK IN THE EVENT OF 1) ~~SEISMIC~~ SEISMIC EVENT ; 2) FIRE & 3) NUCLEAR EMERGENCY @ KNPS.
- ② VISUAL IMPACT
- ③ - NUCLEAR WASTE SHOULD BE STORED IN AN ~~REMOTE~~ REMOTE AREA REMOTE FROM DENSE HABITATION.

## Comments from Graham Arbuckle:

As a resident of VanRiebeeckstrand and owner of land neighbouring Koeberg, my overriding concerns are:

- 1) That potentially harmful radioactive materials – spent fuel – are to be stored on site at the KNPS in quantities higher than originally planned for by the design of KNPS –within 2km of a residential suburb, and on a site optimized for power plant operation, as opposed to nuclear waste storage.
- 2) That due to the lack of any existing permanent storage solutions, the Transient Interim Storage Facility will be used indefinitely – up to and beyond the operating life of KNPS.
- 3) That due to the lack of any existing permanent storage solutions, the Transient Interim Storage Facility will be used for waste from other Nuclear Power Stations.
- 4) That due to the construction of the Transient Interim Storage Facility, the political will to pursue construction of permanent storage solutions will become diffused.

## Specifics:

- 1) Please could you make available the slides/posters that made up the Public Open Day presentation. This would allow an opportunity for the many stakeholders that could not attend the Public Open Day to comment on the more (as opposed to the BID) comprehensive material presented.
- 2) Please ensure that the S&EIA takes into consideration the other proposed projects for the site. To assess the impact of a project in isolation of other plans for the area would render this S&EIA flawed, and in turn would render the pre-existing S&EIA reports meaningless. Amongst others, this project could potentially interrelate with:
  - Eskom Nuclear-1 proposals
  - Eskom Weskusfleur substation proposals
  - Sunbird Ibhubesi methane gas pipeline proposals
  - Western Cape Government LNG pipeline proposals
  - City of Cape Town pilot desalination plant proposals.
- 3) It should be required that a stakeholder-reviewed comprehensive risk analysis of the consequential and cumulative risks associated with the project and its location be undertaken. These include risks associated with a nuclear emergency at KNPS and/or Nuclear-1; fire; and natural events including an earthquake, tremor, sinkhole, or tsunami.

- 4) Please detail the regulatory/legislative framework that would prohibit the use of the site beyond the operating life of KNPS, and prohibit the use of the site for storage of waste from other sites, including Nuclear-1.
- 5) Please detail the projected design lifespan of the proposed casks, and detail the expected period that the materials stored within the casks would remain hazardous. Please detail the safety checks that would be undertaken to ensure the casks remain effective, and detail the procedures in place for replacing the casks as required.
- 6) The approval of construction of the TISF should be conditional on a commitment to build a permanent storage/reprocessing facility at a site elsewhere.

**ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED  
USED FUEL TRANSIENT INTERIM STORAGE FACILITY  
AT KOEBERG NUCLEAR POWER STATION**

SRK PROJECT NO: 478317

**STAKEHOLDER REGISTRATION AND COMMENT FORM**

Please complete and submit this form by hand, post, fax or email to:  
**SRK Consulting**  
 Jessica du Toit  
 The Administrative Building, Albion Springs, 183 Main Road, Rondebosch, 7700  
 Postnet Suite #206, Private Bag X18, Rondebosch, 7701  
 Fax: 021 685 7105    Tel: 021 659 3060  
 E-mail: jedutoit@srk.co.za

**PLEASE PRINT CLEARLY**

*M. Herbert*

**TO REGISTER AS A STAKEHOLDER:**

**Name:** Discussion with Graham Arbuckle.      **Date:** \_\_\_\_\_

**Organisation (if any):** \_\_\_\_\_

**Capacity (if applicable):** \_\_\_\_\_

**Postal address:** \_\_\_\_\_

\_\_\_\_\_ **Postal code:** \_\_\_\_\_

**Telephone number:** \_\_\_\_\_ **Fax number:** \_\_\_\_\_

**E-mail:** \_\_\_\_\_

**Preferred communication method (email / fax / post):** \_\_\_\_\_

**Please indicate any direct business, financial, personal or other interest that you may have in the application:**

*Other Projects*

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>- EIA - Sunbird</li> <li>- EIA - CoCT Pipeline</li> <li>- EIA - Nuclear 1</li> </ul> | <ul style="list-style-type: none"> <li>- EIA - Westfleur substation.</li> <li>- Desalination Plant.</li> </ul> |
|---|--|

**Any initial comments or concerns that you may have regarding the proposed project can be indicated below and/or on a separate page:**

- Risk Assessment on the interaction betw. Koeborg & Nuclear 1
- Koeborg Nature Reserve Management Plan.  
 ↳ Do we need Cape Nature's & Management Approval before we can start on this project.
- Has the cumulative impacts of this project and Nuclear 1 & other projects been considered? How will it be considered?

- What happening in the National Nuclear Radioactive Waste Disposal Act. Why is the CWF not in place.
- Layout & location of TISF in relation to the Nuclear 1 Site.

ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED  
USED FUEL TRANSIENT INTERIM STORAGE FACILITY  
AT KOEBERG NUCLEAR POWER STATION

SRK PROJECT NO: 478317

STAKEHOLDER REGISTRATION AND COMMENT FORM

Please complete and submit this form by hand, post, fax or email to:

**SRK Consulting**

Jessica du Toit

The Administrative Building, Albion Springs, 183 Main Road, Rondebosch, 7700

Postnet Suite #206, Private Bag X18, Rondebosch, 7701

Fax: 021 685 7105 Tel: 021 659 3060,

E-mail: jedutoit@srk.co.za

PLEASE PRINT CLEARLY

TO REGISTER AS A STAKEHOLDER:

Name: JAN NORMAN Date: 9/10/2015

Organisation (if any): N/A

Capacity (if applicable): HOME OWNER

Postal address: ERF 3108, 25 EDWARD CRESCENT,  
DUYNESFONTEIN

Postal code: 7441

Telephone number: 078 733 8307 Fax number: 086 608 2452

E-mail: JAN.NORMAN@ESKOM.CO.ZA

Preferred communication method (email / fax / post): EMAIL/FAX

Please indicate any direct business, financial, personal or other interest that you may have in the application:

I AM A HOME OWNER AND ABUTTING NEIGHBOR TO THE KOEBERG OWNER CONTROLLED AREA

Any initial comments or concerns that you may have regarding the proposed project can be indicated below and/or on a separate page:

- THE CREATION OF A SPENDT FUEL STORAGE AREA CLOSE TO A RESIDENTIAL AREA

ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED  
USED FUEL TRANSIENT INTERIM STORAGE FACILITY  
AT KOEBERG NUCLEAR POWER STATION

SRK PROJECT NO: 478317

STAKEHOLDER REGISTRATION AND COMMENT FORM

Please complete and submit this form by hand, post, fax or email to:

**SRK Consulting**

Jessica du Toit

The Administrative Building, Albion Springs, 183 Main Road, Rondebosch, 7700

Postnet Suite #206, Private Bag X18, Rondebosch, 7701

Fax: 021 685 7105 Tel: 021 659 3060,

E-mail: jedutoit@srk.co.za

PLEASE PRINT CLEARLY

TO REGISTER AS A STAKEHOLDER:

Name: DLOFF DREYER Date: 16/10/2015

Organisation (if any): MELKBOSSTRAND PRIVATE SCHOOL

Capacity (if applicable): 200

Postal address: P.O. Box 441  
MELKBOSSTRAND

Postal code: 7437

Telephone number: 021 553 1530 Fax number: 021 553 0610

E-mail: info@melkbosstrandprivate.co.za

Preferred communication method (email / fax / post): EMAIL

Please indicate any direct business, financial, personal or other interest that you may have in the application:

NONE

Any initial comments or concerns that you may have regarding the proposed project can be indicated below and/or on a separate page:

GENERAL OPERATIONAL HEALTH AND SAFETY PRECAUTIONS.

ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED  
USED FUEL TRANSIENT INTERIM STORAGE FACILITY  
AT KOEBERG NUCLEAR POWER STATION

SRK PROJECT NO: 478317

STAKEHOLDER REGISTRATION AND COMMENT FORM

Please complete and submit this form by hand, post, fax or email to:

SRK Consulting

Jessica du Toit

The Administrative Building, Albion Springs, 183 Main Road, Rondebosch, 7700

Postnet Suite #206, Private Bag X18, Rondebosch, 7701

Fax: 021 685 7105 Tel: 021 659 3060,

E-mail: jedutoit@srk.co.za

PLEASE PRINT CLEARLY

TO REGISTER AS A STAKEHOLDER:

Name: Ryno van der Riet Date: 2015-10-20

Organisation (if any): /

Capacity (if applicable): /

Postal address: 64 BEACH ROAD,

MELK BOSSERANSO

Postal code: 7441

Telephone number: 021 444 8402 (w) Fax number:

E-mail: rudriet@telkom sa.net

Preferred communication method (email / fax / post): email

Please indicate any direct business, financial, personal or other interest that you may have in the application:

NO

Any initial comments or concerns that you may have regarding the proposed project can be indicated below and/or on a separate page:

- SFP is already at potential risk if damaged/leaked/bombed. It is not a secure facility to prevent radiation such as the containment and what will be done to have a "never radiation facility?"
- Will there be any radiation exposure to residential areas if the cooled down used fuel assembly is transferred to the cask, and if damaged in the cask or the cask being damaged?
- what will be done @ KAPS if the cooling loops are not achieved of spent fuel assemblies for safe transfer to the cask?

J  
2015-10-20



**E-mail** duvall@mweb.co.za  
**Phone** Chairperson 073 357 6359  
**Postal** P O Box 235 Melkbosstrand 7437  
**Website** [www.melkbosstrand.net](http://www.melkbosstrand.net)

12th October, 2015

Ms Jessica Du Toit  
SRK Consulting  
183 Main Road  
Rondebosch  
7700

Dear Ms Du Toit,

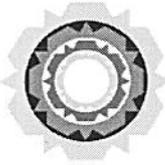
Re: Transient Interim Storage Facility at Koeberg Nuclear Power Station

Thank you for the information relating to the storage of dry casks at Koeberg Nuclear Power Station. The Melkbosstrand Ratepayers Association has no objection to this facility.

Please continue to keep us on your mailing list.

Yours sincerely

(Mrs) SM La Grange  
Chairperson - Melkbosstrand Ratepayers Association  
Ward 23 Representative  
(Previous Chairperson – Koeberg Public Safety Information Forum 2015)



CITY OF CAPE TOWN  
ISIXEKO SASEKAPA  
STAD KAAPSTAD

ENERGY, ENVIRONMENT AND SPATIAL PLANNING DIRECTORATE  
ENVIRONMENTAL RESOURCE MANAGEMENT DEPARTMENT

**Morné Theron**  
Senior Environmental Practitioner

T: (021) 444 0601 F: (021) 444 0605  
E: morne.theron@capetown.gov.za  
**Ref: BA 21/1/2/2/13N**

9 November 2015

SRK Consulting (South Africa) (Pty) Ltd  
Postnet Suite #206  
P Bag X18  
RONDEBOSCH  
7701

**Attention: Ms Jessica du Toit**

[e-mail: jedutoit@srk.co.za]  
Tel: 021 659 3060  
Fax: 021 685 7105

Dear Madam

**CAPE FARM 34, DUYNEFONTEIN: USED FUEL TRANSIENT INTERIM STORAGE FACILITY AT KOEBERG NUCLEAR POWER STATION: BACKGROUND INFORMATION DOCUMENT**

The abovementioned Background Information Document (BID), your reference *SRK Project Number 478317*, dated September 2015, refers.

Kindly register the Environmental Resource Management Department: Blaauwberg District as the official City of Cape Town entry point for comment on the aforementioned EIA.

1. Be advised that the Environmental Resource Management Department (ERMD) is the duly mandated department to provide co-ordinated City comment on EIAs conducted within the municipality's jurisdiction. As the Koeberg Nuclear Power Station falls within the Blaauwberg District of the City your EIA must be submitted to this office for comment.
2. In order for the City to meet the statutory commenting deadline(s) you are required to timeously submit 1 x CD and 1 x hard copy of the various Environmental Impact Assessment reports to this office before ERMD can circulate the draft scoping report to all our affected line departments. The public participation commenting period will be calculated from the date that this office receives the CD and hard copy. As such please ensure that the CD and necessary documentation is delivered to our physical address as stated below.
3. In the interim the following comment is provided based on the limited information that was provided in the BID:
  - a. Please reflect the DEA reference number in all future correspondence.
  - b. Please list the listed activities in terms of the NEMA Listing notices that environmental authorization is being required.
  - c. Reflect the erf number of the subject property (i.e. Cape Farm 34, Duynefontein) in future documentation.

Kindly submit the draft Scoping Report (once available) to this office in the form of 1 x hard copy and 1 x CD version.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Pat Titmuss', with a long horizontal flourish extending to the right.

**PAT TITMUSS**  
**REGIONAL MANAGER: ENVIRONMENTAL & HERITAGE MANAGEMENT: Northern Region (Blaauwberg District)**

## Questions for the EIA ; from 'TUG' WILSON

1/ The original Koeberg Emergency Plan which I was involved in writing followed strict guidelines especially with respect to Source Term, Emergency planning Zones, EPZ, LPZ, OCA etc. are we not already in conflict with the original licence.

2/ With the stockpiling of used fuel at Koeberg you will be increasing the potential "Source Term" while at the same time the population is increasing in the EPZ (16km) and getting EVER NEARER TO KOEBERG! Are you aware that a huge Shopping Mall (R1,9 Billion) is under construction within the zone and only 12 KM from Koeberg.

3/ Why not Vaalpoets as originally envisaged? If we are really going to build more Nuclear Stations it makes more sense to have a central repository.

\* ARNIE THIS CASTLE SAFE TO FLY,!!

ENVIRONMENTAL IMPACT ASSESSMENT PROCESS FOR THE PROPOSED  
USED FUEL TRANSIENT INTERIM STORAGE FACILITY  
AT KOEBERG NUCLEAR POWER STATION

SRK PROJECT NO: 478317

STAKEHOLDER REGISTRATION AND COMMENT FORM

Please complete and submit this form by hand, post, fax or email to:

SRK Consulting

Jessica du Toit

The Administrative Building, Albion Springs, 183 Main Road, Rondebosch, 7700

Postnet Suite #206, Private Bag X18, Rondebosch, 7701

Fax: 021 685 7105 Tel: 021 659 3060

E-mail: jedutoit@srk.co.za

PLEASE PRINT CLEARLY

TO REGISTER AS A STAKEHOLDER:

Name: Robert Mayhew. Date: \_\_\_\_\_

Organisation (if any): \_\_\_\_\_

Capacity (if applicable): \_\_\_\_\_

Postal address: \_\_\_\_\_

Postal code: \_\_\_\_\_

Telephone number: \_\_\_\_\_ Fax number: \_\_\_\_\_

E-mail: \_\_\_\_\_

Preferred communication method (email / fax / post): \_\_\_\_\_

Please indicate any direct business, financial, personal or other interest that you may have in the application:

\_\_\_\_\_

Any initial comments or concerns that you may have regarding the proposed project can be indicated below and/or on a separate page:

- What are the plans for transportation of the casks (each option)
- Has Eskom considered reprocessing a cost of reprocessing vs cost to environment/humans. So much left in used rods so not 'robbing the earth of minerals'.
- Why aren't Eskom disposing used fuel at Vaalpoort? rather than 'temporary'.
- Has COCT considered evacuation plan a new developments within 16km of Koeborg eg new shopping mall at Sunningdale.
- Why aren't their provisions to make something more permanent if more nuclear facilities built at Koeborg?

## Du Toit, Jessica

---

**From:** Trevor Moodley <MoodleyT@eskom.co.za>  
**Sent:** 18 March 2016 12:08 PM  
**To:** Du Toit, Jessica  
**Subject:** Dry Casking

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi  
Hope you all are well.  
Used fuel transient interim storage facility  
External casking is an excellent and proven technology that is safe for this cause. The chosen locations on site guarantees its protection , control and strict oversight.  
Experience from the current storage on-site at the Low Level Storage Area justifies this claim of safe spent fuel storage.  
Have yourselves a great day further.  
With Kind Regards

Ps: When do we build the next Nuclear Power Plant.

*MAHATMA GANDHI : I shall pass through this world but once. Any good that I can show to my fellow human being, let me do it now. Let me not deter or neglect, for I shall not pass this way again.*

*MAHATMA GANDI : Silence becomes cowardice when occasion demands speaking out the whole truth and acting accordingly.*

*BENJAMIN FRANKLIN: Tell me and I forget. Teach me and I remember. Involve me and I learn.*

*Make your passion your job, and you will never work a day in your life.*

Trevor Moodley  
Quality Control Inspector (Mech/Corr)  
Eskom(Koeberg Nuclear Power Station)  
Private Bag X10, Kernkrag, 7440, CAPE TOWN, RSA.  
R27 Off West Coast Rd, Melkbosstrand, Western Cape.  
Tel+27(0)21 550 4911 | Direct +27(0)21 522 3116/ 522 2718 | Fax+27(0)86 667 4953  
Cell a/h: +27(0)79 797 0363  
E-mail [trevor.moodley@eskom.co.za](mailto:trevor.moodley@eskom.co.za) , Website [www.eskom.co.za](http://www.eskom.co.za)



NB: This email and its contents are subject to the Eskom Holdings SOC Limited email legal notice which can be viewed at [http://www.eskom.co.za/Pages/Website\\_Terms\\_Conditions.aspx](http://www.eskom.co.za/Pages/Website_Terms_Conditions.aspx)

I'm part of the 49Million initiative...  
<http://www.49Million.co.za>

## Du Toit, Jessica

---

**From:** Mike Thurgood <mike.thurgood@imaginet.co.za>  
**Sent:** 18 March 2016 04:34 PM  
**To:** Du Toit, Jessica  
**Subject:** Re: 478317: Koeberg TISF EIA - Availability of Draft Scoping Report for comment

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Jessica du Toit BSc (ConsEcol), MPhil (Env Mgmt)

Environmental Consultant



Dear Ms du Toit,

### KOEBERG TISF

There are no specific technical points I wish to raise in addition to what have already been raised and answered.

However, there is an issue which could become a major one at some stage in the future, and that is the terrorist activities of Muslim extremists. No matter how remote we might wish to believe that South Africa is from their terrorist activities, they may see targets in South Africa as easy ones to attack in contrast to those in the Middle East and Europe and the USA where anti-terrorist measures are continually being strengthened. The basis of such attacks, if they ever occurred, would be unlikely to be against South Africa *per se*, but merely to demonstrate their capabilities to the rest of the world with whom they are waging their terrorist activities.

I do not doubt that the Koeberg NPS site is a secure site, and attacks by suicide agents would be most unlikely. The most likely type of attack goes modern these days, with the use of drones. Therefore I would see such a storage site, with its upstanding containers for dry used fuel elements, being a major risk from possible drone attacks.

Therefore sophisticated air strike detecting equipment would need to be installed around the site, with the accompanying means to both divert the drones and to shoot them down.

If it ever goes ahead, at some considerable time in the future there could be further nuclear power plants constructed in the Duynefontein area, being a part of the projected nuclear expansion programme, for which two sites have been selected, Thuyspunt in the Eastern Cape, and Duynefontein. A similar storage problem could eventually arise, specifically if a national used fuel element storage facility hasn't become available by then.

Regards,

R Mike Longden-Thurgood

5 Nerina Street, Milnerton 7441

----- Original Message -----

**From:** [Du Toit, Jessica](#)

**To:** [Masson, Scott](#)

**Sent:** Friday, March 18, 2016 11:10 AM

**Subject:** 478317: Koeberg TISF EIA - Availability of Draft Scoping Report for comment

Dear Stakeholder

**NOTICE OF RELEASE OF DRAFT SCOPING REPORT: PROPOSED USED FUEL TRANSIENT INTERIM STORAGE FACILITY AT KOEBERG NUCLEAR POWER STATION**

Eskom proposes to construct a Transient Interim Storage Facility (TISF) for the temporary storage of dry casks at the Koeberg Nuclear Power Station (KNPS) to accommodate used nuclear fuel from the reactors of the power station, thereby ensuring the continued operation of the KNPS. SRK Consulting (South Africa) (Pty) Ltd (SRK) has been appointed to undertake the Scoping and Environmental Impact Reporting (S&EIR – often referred to as the Environmental Impact Assessment [EIA]) process required in terms of the National Environmental Management Act 107 of 1998 (NEMA) and the EIA Regulations, 2014.

Although the EIA process has not yet formally commenced, SRK previously requested interested parties to register as stakeholders for this EIA process, at which stage you were registered as a stakeholder.

The **Draft Scoping Report** has been compiled and is now available for public review for a period of 30 days, from **18 March until 25 April 2016**. Please find attached a copy of the Executive Summary of the Draft Scoping Report, which also provides details of how you can participate in the EIA process.

Hard copies of the full report are available for viewing at the following venues:

- Koeberg Public Library, Duynfontein;
- Wesfleur Public Library, Atlantis;
- Cape Town Public Library;
- The KNPS Visitors Centre; and
- SRK's office in Rondebosch.

An electronic version of the report can also be accessed on SRK's website: <http://www.srk.co.za/en/koeberg-tisf-eia>.

Stakeholders are invited to comment, and/or to register on the project database. Stakeholders must provide their comments together with their name, contact details (preferred method of notification, e.g. email), and an indication of any direct business, financial, personal or other interest which they have in the application, to Jessica du Toit at SRK Consulting: Tel: 021 659 3060; Fax: 021 685 7105; or email: [jedutoit@srk.co.za](mailto:jedutoit@srk.co.za).

**Jessica du Toit** BSc (ConsEcol), MPhil (Env Mgmt)

Environmental Consultant



SRK Consulting (South Africa) Pty Ltd

The Administrative Building, Albion Spring, 183 Main Road, Rondebosch, 7700

Postnet Suite # 206, Private Bag X18, Rondebosch, 7701

**Tel:** +27-(0)21-659-3060; **Fax:** +27-(0)21-685-7105

**Mobile:** + 27-(0)76-133-9776; **Direct:** +27-(0)21-659-3083

**Email:** [jedutoit@srk.co.za](mailto:jedutoit@srk.co.za)

[www.srk.co.za](http://www.srk.co.za)

*This transmission is intended for the sole use of the addressee, and may contain information that by its privileged and confidential nature is exempt from disclosure under applicable law. You are hereby notified that any dissemination, distribution or duplication of this transmission by someone other than the intended recipient or its designated agent is strictly prohibited. If you have received this transmission in error, please notify the sender immediately by replying to this transmission, or by collect call to the above phone number.*

Please consider the environment before printing this e-mail.





**Western Cape  
Government**

Local Government

**OFFICE OF THE HEAD OF DEPARTMENT**

G PAULSE

**File Reference:** 2016/480

The Environmental Consultant  
SRK Consulting (South Africa) Pty Ltd  
Postnet Suite #206  
Private Bag X18  
**RONDEBOSCH**  
7701

Per Email: [jedutoit@srk.co.za](mailto:jedutoit@srk.co.za)

Dear Ms Du Toit

**PROPOSED USED FUEL TRANSIENT INTERIM STORAGE FACILITY AT KOEBERG NUCLEAR POWER STATION**

I refer to your letter dated 18 March 2016, regarding the above-mentioned matter.

My Department is not in a position to give any comment on the proposed used fuel transient interim storage facility at Koeberg Nuclear Power Station.

Yours faithfully

**G PAULSE**

**ACTING HEAD OF DEPARTMENT**

**DATE:** 2016/04/13

8<sup>TH</sup> Floor, Waldorf Building, Cape Town, 8001

Tel: +27 21 483 4999 fax: +27 21 483 4493

E-Mail [Hod.LG@westerncape.gov.za](mailto:Hod.LG@westerncape.gov.za) / [Amanda.willett@westerncape.gov.za](mailto:Amanda.willett@westerncape.gov.za)

Private Bag X9076, Cape Town, 8000

[www.westerncape.gov.za](http://www.westerncape.gov.za)



## environmental affairs

Department:  
Environmental Affairs  
REPUBLIC OF SOUTH AFRICA

Private Bag X 447 · PRETORIA · 0001 · Environmental House · 473 Steve Biko Road · PRETORIA  
Tel (+ 27 12) 399 9972

**DEA Reference:** 14/12/16/3/1/71

**Enquiries:** Ms Salome Mambane

**Tel:** 012 399 9385 **E-mail:** [SMambane@environment.gov.za](mailto:SMambane@environment.gov.za)

Jessica du Toit  
SRK Consulting (South Africa) (Pty) Ltd  
Postnet Suite #206  
P Bag X18  
**RONDEBOSCH**  
7701

**Fax:** 021 685 7105  
**Tel:** 021 659 3060  
**Email:** [capetown@srk.co.za](mailto:capetown@srk.co.za)

### PER EMAIL / MAIL

Dear Sir/Madam

### ACKNOWLEDGEMENT OF RECEIPT OF DRAFT SCOPING REPORT FOR THE PROPOSED USED FUEL TRANSIET INTERIM STORAGE FACILITY AT KOEBERG NUCLEAR POWER STATION, WESTERN CAPE PROVINCE

The Department confirms having received the Draft Scoping Report for the above-mentioned project on 22 March 2016

Please take note of Regulation 40(3) of the 2014 EIA Regulations, which states that potential Interested & Affected Parties, including the competent authority, may be provided with an opportunity to comment on reports and plans contemplated in subregulation (1) prior to the submission of an application but must be provided an opportunity to comment on such reports once an application has been submitted to the competent authority.

Furthermore, take note that this Department does not have an application with you and therefore you are required to lodge an application form accompanied by a draft basic assessment report for considerations by this Department. You are hereby reminded that the activity may not commence prior to an environmental authorisation being granted by the Department.

Yours sincerely

**Mr Sabelo Malaza**

**Chief Director: Integrated Environmental Authorisations**

**Department of Environmental Affairs**

**Letter signed by: Ms Senisha Soobramany**

**Designation: Environmental Officer (Grade A): Integrated Environmental Authorisations**

**Date:** 5 April 2016



**REFERENCES:**

- 16/3/3/6/4/2/1/A1/14/3085/16 (Development Management)  
19/2/5/3/A1/14/WL0051/16 (Waste Management)  
19/4/4/A1/14 – Koeberg Nuclear Power Station (Air Quality Management)

**DATE:** 2016 -04- 2-5

The Board of Directors  
SRK Consulting  
Postnet Suite # 206  
Private Bag X18

**RONDEBOSCH**  
7701

**For attention: Ms Jessica du Toit**

Tel: (021) 659 3060  
Fax: (086) 530 7003

Dear Madam

**COMMENT ON THE PRE-APPLICATION SCOPING REPORT FOR THE PROPOSED USED FUEL TRANSIENT INTERIM STORAGE FACILITY AT THE KOEBERG NUCLEAR POWER STATION ON FARM DUYNEFONTYN NO. 1552**

1. The above-mentioned Scoping Report dated March 2016 and received by the Department of Environmental Affairs and Development Planning (hereinafter referred to as "the Department") on 16 March 2016, refers. The following consolidated comment by various directorates in the Department is hereby offered.
2. Directorate: Development Management (Region 1) – Melanese Schippers ([Melanese.Schippers@westerncape.gov.za](mailto:Melanese.Schippers@westerncape.gov.za); Tel: (021) 483 8349)
  - 2.1 It is noted that a new haul road with a length of 100m and an unspecified width will be constructed at the entrance to site alternative 1. Clarity with respect to the width of the road must be provided in order to determine whether Activity 4 of GN. No. R. 985 of 4 December 2014 is applicable to the proposed development.
  - 2.2 It is noted that a more detailed description of the proposed development will be included in the Environmental Impact Assessment (EIA) Report. Please note the activity description must include,

*inter alia*, a description of the associated infrastructure (e.g. width of the road to be constructed) and water and electricity requirements for the proposed development.

- 2.3 According to Appendix 2 (Content of a Scoping Report) of GN No. R. 982 of 4 December 2014, the Scoping Report must include a motivation for the need and desirability of the proposed development, including the need and desirability of the activity in the context of the preferred location. It is acknowledged that the pre-application Scoping Report includes a motivation for the need of the proposed development; however a motivation of the need and desirability in the context of the preferred location has not been included. This aspect needs to be addressed in the Draft Scoping Report (DSR) to be submitted for public comment.
  - 2.4 The high-water mark indicated in Figure 3-5 of the pre-application Scoping Report appears to depict the low-water mark of the sea. Please ensure that the high-water mark of the sea is accurately delineated and reported on in the DSR to determine whether other EIA listed activities are triggered.
  - 2.5 The Scoping Report to be submitted to the competent authority must include details of the public participation process undertaken in terms of regulation 41 of the 2014 EIA Regulations, including proof of notification to interested and affected parties.
3. Directorate: Waste Management – Muneeb Baderoon ([Muneeb.Baderoon@westerncape.gov.za](mailto:Muneeb.Baderoon@westerncape.gov.za); Tel: (021) 483 2965):
    - 3.1 The waste management hierarchy (reduction, re-use and recycling of waste) must be implemented to ensure that the disposal of waste should only be considered as a last resort. All non-radioactive waste generated during the construction and operation of the transient interim storage facility (TISF) which cannot be re-used or recycled, must be disposed of at a waste disposal facility licenced to accept such waste.
    - 3.2 Your attention is drawn to Schedule 3 of the National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008), which defines and identifies categories and waste types. Category A, Section 15 of Schedule 3 identifies certain types of construction waste as hazardous waste (e.g. wastes from other construction and demolition, etc.). Such wastes must be stored in hazardous waste containers and be disposed of at a hazardous waste facility (i.e. it may not be disposed of with non-hazardous construction waste).
    - 3.3 General waste and the non-hazardous portion of construction waste should be stored and disposed of separately. This recommendation is due to general waste being disposed of on the working phase of a waste disposal facility, whilst the non-hazardous construction waste is often used as cover material.
  4. Directorate: Air Quality Management – Peter Harmse ([Peter.Harmse@westerncape.gov.za](mailto:Peter.Harmse@westerncape.gov.za); Tel: (021) 483 8343):
    - 4.1 It is anticipated that the construction of access roads and the development of the TISF will generate noise, dust and exhaust emissions, which could potentially result in significant impacts. The applicant must comply with the National Dust Control Regulations of 1 November 2013 (GN No. R. 827), promulgated in terms of the National Environmental Management: Air Quality Act, 2004

(Act No. 39 of 2004). These regulations prohibit a person from conducting any activity in such a way as to give rise to dust in such quantities and concentrations that the dust, or dust fall, may have a detrimental impact on the environment, including health.

- 4.2 Noise generated during the construction and operation of the proposed TISF must comply with the Western Cape Noise Control Regulations (Provincial Notice 200/2013) of 20 June 2013.
  - 4.3 The TISF must meet the requirements of the National Nuclear regulator and must be constructed and managed according to the International Atomic Energy Agency safety standards.
  - 4.4 Personnel must be trained in emergency response procedures dealing with accidental spillage/leakage of spent fuel from dry casks.
  - 4.5 The review of the existing Koeberg Nuclear Power Station Emergency Response Plan must address accidental emission from the dry casks to the atmosphere and must include the emergency incident procedures referred to in Section 30 of National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA). Any incident must immediately be reported to the relevant and all the necessary documentation must be completed and submitted to the relevant authorities within the prescribed timeframes.
  - 4.6 The applicant is hereby reminded of his requirement to comply with the "Duty of care" as defined in Section 28 of the NEMA.
5. Directorate: Pollution and Chemicals Management – Zayed Brown  
([Zayed.Brown@westerncape.gov.za](mailto:Zayed.Brown@westerncape.gov.za); Tel: (021) 483 8367)
- 5.1 This Directorate has no comments on the pre-application Scoping Report and will provide detailed comment on the specialist studies to be included in the EIA Report.
6. Please direct all enquiries to the officials indicated in this correspondence should you require any clarity on any of the issues/comments provided.
7. The Department reserves the right to revise initial comments and request further information based on the information received.

Yours faithfully

  
**HEAD OF DEPARTMENT**  
**DEPARTMENT OF ENVIRONMENTAL AFFAIRS AND DEVELOPMENT PLANNING**



25 April 2016

SRK Consulting (South Africa) (Pty) Ltd  
Postnet Suite #206  
P Bag X18  
RONDEBOSCH  
7701

**Attention: Ms Jessica du Toit**

[e-mail: jedutoit@srk.co.za]  
Tel: 021 659 3060  
Fax: 021 685 7105

Dear Madam

**CAPE FARM 1552, DUYNEFONTEIN: USED FUEL TRANSIENT INTERIM STORAGE FACILITY AT KOEBERG NUCLEAR POWER STATION: DRAFT SCOPING REPORT**

The abovementioned draft scoping report (DSR), your reference *SRK Report Number 478317/03*, dated March 2016, refers.

1. Reflect the erf number of the subject property (i.e. Cape Farm 1552, Duynefontein) in all future documentation/report's cover pages.
2. A conceptual stormwater management plan in terms of the *City of Cape Town: Management of Urban Stormwater Impacts Policy (2009)* must form part of the final EIR. As such this must be included in the proposed Plan of Study of the EIA as already acknowledged in section 3.5.7 of the DSR.
3. Adequately air pollution, dust and noise mitigation measures for all phases of the project must be included in the draft Environmental Management Programme (EMPr) to be submitted during the next phase of the EIA process.
4. Both site alternatives are considered previously disturbed as a result of the previous power station construction activities, but appear to have been recolonized well by strandveld species. The proposal to appoint a terrestrial specialist during the EIA phase therefore is supported. The specialist should ensure that no threatened species will be impacted and this will require a late winter/early spring survey, with assistance from a local botanist familiar with the flora. These aspects should be specified in the Terms of Reference. In addition, the specialist should consider suitable mitigation for the loss of over one hectare of an Endangered ecosystem.
5. No infrastructure under the control of the City of Cape Town: Bulk Water Branch exists in the immediate vicinity of the proposed TISF. However, as no anticipated water demands (i.e. AADD, peak week average daily demand) were provided, the City is currently unable to confirm whether or not the City's bulk supply system has sufficient resources, treatment, bulk storage and conveyance capacity to supply the TISF (if required). Further comment will be provided during the next phase of the EIA process, provided that the AADD is provided.
6. Page 9 of the Draft Scoping Report stated that a NID was submitted to HWC in February 2016. A copy of the NID submitted to HWC must be included in the next phase of the EIA process.

The abovementioned comment must be included and addressed in the final scoping report and Specialist Study Terms of References (as applicable). Be advised that, other than the issues raised above, the City of Cape Town concurs with the proposed specialist studies for the Impact Assessment Phase, as well as the proposed Specialist Study Terms of References listed in Section 7 of the DSR.

The City now awaits the competent authority's decision on the proposed Plan of Study for the EIA.

Kindly submit the draft Environmental Impact Report (once available) to this office in the form of 1 x hard copy and 1 x CD / flash disk version.

Yours faithfully



**MORNÉ THERON**  
**[ACTING] REGIONAL MANAGER: ENVIRONMENTAL & HERITAGE MANAGEMENT: Northern Region (**

**SCIENTIFIC SERVICES**

**postal** Private Bag X5014 Stellenbosch 7599  
**physical** Assegaaibosch Nature Reserve Jonkershoek  
**website** [www.capenature.co.za](http://www.capenature.co.za)  
**enquiries** Rhett Smart  
**telephone** +27 21 866 8017 **fax** +27 21 866 1523  
**email** [rsmart@capenature.co.za](mailto:rsmart@capenature.co.za)  
**reference** SSD14/2/6/1/4/1/34\_waste storage\_Koeberg  
**date** 26 April 2016

SRK Consulting  
Postnet Suite 206  
Private Bag X18  
Rondebosch  
7701

Attention: Jessica du Toit  
By email: [jedutoit@srk.co.za](mailto:jedutoit@srk.co.za)

Dear Jessica

**Draft Scoping Report for the Proposed Used Fuel Transient Interim Storage Facility at Koeberg Nuclear Power Station, Cape Town**

CapeNature would like to thank you for the opportunity to comment on the proposed development and would like to make the following comments. Please note that our comments only pertain to the biodiversity related impacts and not to the overall desirability of the proposed development.

The proposed facility will be placed on a concrete slab within the existing designated operational area of the existing nuclear power station. This area has been classified as No Natural, with the remainder of the Koeberg property forming part of the Koeberg Nature Reserve and therefore classified as Protected Area. The natural vegetation occurring on the property is Cape Flats Dune Strandveld, listed as Endangered. There are no freshwater features or wetlands within the footprint of the proposed facility, although they do occur elsewhere within the Koeberg Nature Reserve.

The Plan of Study for EIA proposes a terrestrial ecology specialist study, in addition to other specialist studies not related to biodiversity. CapeNature supports the proposed specialist study and recommends that the focus must be on the impact on coastal and dune ecology and related processes, due to the location near the coastline. This is however in the context of the surrounding much larger existing facility.

It should further be noted that there is already a large volume of existing information for the Koeberg property due to the various applications that have taken place on the property and could potentially be used to inform the assessment of potential impacts of the proposed facility, and therefore may not require further fieldwork, depending on the information available.

CapeNature will comment further in the EIA Phase of the project. We do wish to however point out the potential confusion that may arise between the reference to the Koeberg Nuclear Power Station Protected Area which is a restricted area surrounding the reactor units to which only authorised personnel have access and the protected area status that Koeberg Nature Reserve has in terms of the National Environmental Management: Protected Areas Act (Act 57 of 2003).

The Western Cape Nature Conservation Board trading as **CapeNature**

Board Members: Prof Gavin Maneveldt (Chairperson), Mr Carl Lotter (Vice Chairperson), Mr Mervyn Burton, Dr Bruce McKenzie,

Ms Merle McOmbring-Hodges, Adv Mandla Mdludlu, Mr Danie Nel, Prof Aubrey Redlinghuis, Mr Paul Slack

CapeNature reserves the right to revise initial comments and request further information based on any additional information that may be received.

Yours sincerely

A handwritten signature in black ink, appearing to read "Rhett Smart", with a horizontal line underneath.

**Rhett Smart**  
**For: Manager (Scientific Services)**