

**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 31 October 2012)

Issues have been received from the following stakeholders:

No	Name	Organisation
1	Mike Kantey	Earthlife Africa
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NO	DATE	NAME & ORGANISATION	ISSUES / COMMENTS	RESPONSE
1	31 October 2012, email received from Eskom. 26 October 2012, email received by Eskom entitled <i>Issues List</i>	Mike Kantey, Earthlife Africa	<p>Mr Kantey enquired about a document referred to on page 14 of the Appendix E26 of the Revised Draft for the Environmental Impact Report for "Nuclear-1": <u>NSIP 013244</u></p> <p>Mr Kantey stated that , the current version of the EIR recommends the development of a Pressurised Water Reactor at the Thyspunt site near Cape St Francis in the Eastern Cape and given the assertions made on page 14 of Appendix E26 of the RDEIR -- that the design of the new nuclear power stations do NOT require stringent emergency planning procedures.</p> <p>According to him it is essential that we all have access to and understand the content of this document in order to assess the veracity of the claims. He also feels that it is disturbing that the claims are based on those of the European Nuclear Industry's own lobbyists, rather than the South African statutory authority, the National Nuclear Regulator.</p>	<p>Your comment is noted. A copy of the document is available on the GIBB website: http://projects.gibb.co.za/Projects/Eskom-Nuclear-1 Under section 13: Background literature.</p> <p>As stated in the Revised Draft EIR Version 1, it is an assumption that the NNR will accept the EUR's Emergency Planning Zone (EPZ) recommendations during the nuclear licensing process. Initial indications provided by the NNR are that it is likely that the EPZ will be reduced. For instance, in a presentation to the Parliamentary Select Committee on Economic Development on 1 June 2010, the Chief Executive Officer of the NNR stated the following: "One major outcome of these new designs is that the emergency planning zones, specifically the Urgent Planning Zone, which is the zone within which evacuation of the public has to be catered for, would in all likelihood be reduced from 16 km in the case of Koeberg, to a much smaller radius which could fall within the property owned by the holder ...".</p> <p>Section 3.20.2 of the Revised Draft EIR Version 2 deals with emergency planning zones. It is stated clearly in this section that the EUR standards "were initiated by a group of power utilities from six European countries". There has never been any suggestion that the EUR standards carry any legal status. It is also stated clearly as an assumption of the Revised Draft EIR that the NNR will accept the EUR recommendations. Should this not be the case, then a key assumption of the EIA process would be invalid and a re-assessment would be required.</p>