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Our Ref: J27035
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Dear Mohamed Bhabha

RE: ESKOM EIA CONCERNS FOR THE PROPOSED NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE (DEA Ref. No: 12/12/20/944)

RE: ESKOM ENVIRONMENTAL IMPACT ASSESSMENT (DEA REF. NO.: 12/12/20/944) FOR A PROPOSED NUCLEAR POWER STATION AND ASSOCIATED INFRASTRUCTURE - REVISED DRAFT ENVIRONMENTAL IMPACT ASSESSMENT REPORT COMMENT

Comment 1:

Standard Bank must first declare an interest in the ongoing nuclear EIA process. Alongside ICBC (China), Standard Bank is currently advising China Guangdong Nuclear Power Corporation (CGNPC) on its prospective bid to build/own/operate (as applicable) new nuclear power stations in South Africa.

Response 1:

Your comments are noted and we acknowledge your declaration of interest in the EIA process.

Comment 2:

As to the Revised Draft EIR, Standard Bank believes it is important to clearly distinguish between matters that have been assumed for drafting/submission purposes by Eskom/Arcus Gibb (to DEA) and matters which are in the decision-making domain of other entities within South Africa, for example, Department of Energy or the National Nuclear Regulator (NNR). For example, the Revised Draft EIR contains several references to:

- Generation III technology as being the basis of submission
 - We understand technology decisions (as to Generation 2, 2G+ and / or 3G) to be within the purview of Department of Energy and / or other policy-makers, with NNR responsible for the licensing of any individual technology source post a policy decision. Thus, the EIA should not be the final position.

Response 2:

The EIA, as a decision making tool, is not tasked with making recommendations in terms of technology use in this instance and indeed does not give a position on it. The main purpose of the EIA is to assess the significance of the impacts of the construction and operation of the proposed Nuclear-1 Power Station specifically on the Duynefontein, Bantamsklip and Thyspunt sites. As such

the EIA has used a conservative envelope of criteria (Consistent Dataset), provided by Eskom, to which the technology used must comply, in its assessment of impacts.

Assuming that an authorisation is granted by the Department of Environmental Affairs, a power station design that deviates significantly from that specified in the Consistent Dataset in the Nuclear-1 EIR (Appendix C of the Revised Draft EIR Version 1) would render the design incapable of meeting the requirements of the EIR and the authorisation. Hence such a non-confirming design could not be considered for construction.

Comment 2:

- European Utility Requirements (EUR) on Emergency Planning Zones (EPZs)
 - We understand the EUR currently envisages a significant reduction in the extent of EPZs around its new nuclear plants, which the Revised Draft EIR has followed. As understood by Standard Bank, EURs (a trade body view) is not reflected within South African Law and the position found satisfactory on Koeberg is a somewhat larger evacuation zone. We further understand the scale of the relevant EPZ will be determined by the NNR.

Response 2:

Your comments are noted. The size of the Emergency Planning Zones (EPZs) is not yet certain, as it will be a function of the NNR's nuclear licensing process (as stated by yourselves above). It is an assumption, as stated in the Revised Draft EIR Version 1, that the EPZs will be based on EUR requirements. Should the EPZs determined by the NNR deviate significantly from those assumed in the EIR, then a re-assessment of the environmental impacts may be required.

Comment 3:

From our perspective, our chief concern is that the EIA should be an enabling document such as to allow DOE (or other policymakers) to determine the nuclear technology they deem most appropriate for South Africa; and to allow NNR to license the technology they deem suitable.

Accordingly, in finalising the Revised Draft EIR, we would suggest Eskom/Arcus Gibb submits positions that provide appropriate scope for South Africa's policy-makers to finalise the appropriate technology/tendering solution; and NNR appropriate scope to carry out their licensing/safety duties, without being unduly bound by drafting assumptions.

Response 3:

Your comment is noted. Please see our Response 2 in terms of the role of the EIA process.

Yours faithfully
for GIBB (Pty) Ltd



The Nuclear-1 EIA Team