From:
To: SizewellC

**Subject:** Climate hazards TAG 13 consultation **Date:** 30 September 2021 17:49:13

**Attachments:** comments-form.docx

Dear Case Team, I noted that you had included my advisory on the ONR TAG 13 consultation in the SZC documents tab, please see attached my comments to ONR on the consultation and also please note that at a Community engagement meeting involving local people held Tuesday 28th September I requested that ONR bring forward the revised guidance in view of the urgency of understanding climate change impacts.

Kind regards Mike

Sent from Outlook



Stakeholder comments			ONR to complete			
Comment number	Paragraph / line	Proposed new text	Accepted Y / N	Accepted but not modified	Comment not accepted	Reason comment not accepted
1	Annex 2 at 4	CAUTION. The dominant wind direction this year appears to have been from the north and east. (Suffolk) Has this accelerated coastal erosion at Thorpeness and what is the impact of Felixstowe's dredged shipping channel?				
2	2 at 6	Noted the potential impact of changes to the North Atlantic Oscillation and potential for impacts from large marine mammals on cooling systems due to them chasing their feeding species. Suggest need for a Review of best available techniques on cooling systems as per US EPA rule 316B <a href="https://www.epa.gov/cooling-water-intakes?csModule=security/getfile&amp;PageID=693859">https://www.epa.gov/cooling-water-intakes?csModule=security/getfile&amp;PageID=693859</a>				
3	2 at 90	Noted risk of Climate change tipping point and essential need to review all EN6 siting policy as regards to flood risk particularly flood zone 3 sites				
4	2 at 95	Extreme storm risk noted and essential need to review EN6 sites in flood zone 3				



Stakeholder comments			ONR to complete				
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5	2 at 98 and 8 at 149	Summer heatwaves could generate additional risks from cooling water sea temperature exceeding reactor safety limit (26degrees C?). Passive cooling of the dry casks and DFS building at Sizewell B (and HPC/SZC). Safe storage of higher burn up spent fuel. Gridlines? Do these issues need further expert studies? Winter precipitation may result in increased flood risk on sites. EN6 again needs review.					
6	2 at 8 at 155	Space weather impacts on electrical gridlines and transformers.					
7	Annex 3 at 6 and 73 and 75	Agree that coast protection MUST not impact coastal morphology. The SZC project has dramatically advanced coastal protection towards the sea. Unfortunately local councils have also not adopted a no intervention approach. Need for stronger National Guidance. Also Coastal squeeze must not be generated. Sea level rise exacerbates erosion of soft cliffs.					



Stakeholder comments			ONR to complete				
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8	Annex 3 at 26	Government Vision must accord with a proper Energy review!					
9	Annex 3 at 31	Serious risks issue from marine sea based cooling, biofouling risks from other contaminants eg Hydrazine and desalination* effluents, fisheries impacts. * see note below additional Expert Advice may be available.					
10	Annex 3 at 39	Significant increased risk North Sea storm surge and wave height.					
11	Annex 3 at 51	WAVENET very important that the data and equipment is always available and historic records are free and easy access. Hinkley C Wavenet was removed.					
12	Annex 3 at 58	Flood return levels. Are the flood zones declared by the EA reflective of flood return predictions which some say could be 1 in 1 1 in 10 or 50 as compared to 1 in 200. Does the EA need to revise its advice? National issue EN6 must be revised?					



• \*The Sizewell C project has belatedly acknowledged that a desalination plant is needed in order to supply potable water. This may be required for operation. ONR/EA may wish to study the impacts of desalination, equipment resilience, emergency storage and environmental impacts. Also we note that the revised EN1 may have to consider impacts on town water supply and water framework directive duties. EN6 Nuclear had ignored potable water availability.