Together Against Sizewell C

Deadline 10 Submission TASC IP no. 20026424

TASC comments on ExQ3 Part 3 responses submitted at deadline 8

CC.3.0 Question to the Applicant

Applicant's response is set out in REP8-116:

TASC comment:

SZC Co's response includes this statement:

"…the Project has demonstrated its resilience taking account of the Environment Agency's Climate Change Allowances for Flood Risk Assessments, as well as the guidance specifically relevant to this project provided in the Use of UK Climate Projections 2018 (UKCP18) by GB Nuclear Industry report and ONR/Environment Agency Joint Advice, Principles for Flood and Coastal Erosion Risk Management (ONR, Environment Agency and Natural Resources Wales, July 2017)."

TASC contend that this statement is clearly incorrect as the Applicant's FRA only extends as far as 2140 and the quoted document '*ONR / Environment Agency Joint Advice, Principles for Flood and Coastal Erosion Risk Management (ONR, Environment Agency and Natural Resources Wales, July 2017)'* states, in Appendix A on page 11, *"Full life-time of the station* [should be represented by] – *operational life, plus the time taken for the decommissioning and interim storage of spent fuel and waste, prior to disposal. Again, this should be specified and justified by the operator, <u>but is generally understood to be 160 years</u>* [emphasis added]*."* The same document on page 12 states *"… PINS should be satisfied that the applicant is able to demonstrate suitable flood risk mitigation measures. These mitigation measures should take account of the potential effects of climate change in the most recent marine and coastal flood projections. Applicants should demonstrate that future adaptation/flood mitigation would be achievable at the site, after any power station is built, to allow for any future credible predictions that might arise during the life of the station and the interim spent fuel stores."*

The earliest that SZC could reasonably become operational is 2035 so a lifetime of 160 years takes one to 2195. **An FRA which only extends to 2140 is therefore clearly inadequate.** TASC have set out more detail on this in our Deadline 10 response to document 9.104 REP8-125.

CC.3.1 Question to the Applicant

Applicant's response is set out in REP8-116:

TASC comment:

SZC Co's response says that the ExA 'should not duplicate the considerations of matters that are within the remit of the Nuclear Regulators'. TASC refer to our D10 comments on question CC.3.0 where we referred to page 12 of '*ONR / Environment Agency Joint Advice, Principles for Flood and Coastal Erosion Risk Management (ONR, Environment Agency and Natural Resources Wales, July 2017'* which states *"… PINS should be satisfied that the applicant is able to demonstrate suitable flood risk mitigation measures. These mitigation measures should take account of the potential effects of climate change in the most recent marine and coastal flood projections. Applicants should demonstrate that future adaptation/flood mitigation would be achievable at the site, after any power station is built, to allow for any future credible predictions that might arise during the life of the station and the interim spent fuel stores."* **TASC believes this flatly contradicts the Applicant's statement.**

SZC Co's response refers to their FRA extending only to 2140, so TASC refer to our D10 comments on question CC.3.0 to explain why this is inadequate.

SZC Co state that the Environment Agency will validate SZC Co's assessment of coastal flooding in the D10 submission of their SoCG which appears to indicate that the Environment Agency will be contradicting their own joint advice set out in '*ONR / Environment Agency Joint Advice, Principles for Flood and Coastal Erosion Risk Management (ONR, Environment Agency and Natural Resources Wales, July 2017'*, but as this will be a D10 submission it will leave no opportunity for scrutiny by IPs. Again, TASC refer to our D10 comments to question CC.3.0.

CC.3.2 Question to the Applicant

Applicant's response is set out in REP8-116:

TASC comment:

In its response SZC Co states, *"**It is not possible to clarify long-term coastal change beyond 3-5 decades after development so the Expert Geomorphological Assessment (EGA) of future scenarios only projects as far as 2087*** [emphasis added](*see Section 7 of Volume 2, Appendix 20A [APP-312]). After this point, the direction and scale of environmental changes become increasingly uncertain (as per the EGA [APP-312]) regarding whether natural coastal change would expose the HCDF in the station's lifetime). However, in the broadest sense there are only two outcome 'types' – either no shoreline retreat at Sizewell (in which case no new marine impacts could develop and the SCDF would not need to be maintained) or recession of adjacent shoreline(s).*

*"The latter (recession) is expected and hence the SCDF has been designed and its viability tested and proven across the station life. BEEMS Technical Reports TR544 and TR545 [REP7-101 & REP7-045] clearly demonstrate that persistence and maintenance (see also the Coastal Processes Monitoring and Mitigation Plan (CPMMP) [REP5-059]) of **the SCDF is viable through to the end of the Decommissioning Phase (2140)**, even for the adaptive design at 2140…" (emphasis added).*

As set out in TASC's D10 comments regarding question CC.3.0, modelling to 2140 is inadequate. SZC Co state in the opening part of their response that, *"It is not possible to clarify long-term coastal change beyond 3-5 decades after development."* This highlights the lack of certainty that surrounds the impacts of climate change over the extended period of time when the plant is still expected to be operating and when possibly hundreds or even thousands of tonnes of spent EPR fuel representing a significant radiological threat to people living in the vicinity of the plant will remain on site. **TASC submit that the only reasonable conclusion to be drawn from this state of uncertainty is that the precautionary principle should apply and the ExA should recommend refusal of DCO consent.**

TASC notes the Applicant's acceptance that recession of the Sizewell shoreline is expected in future. We remind the ExA of Paul Collins' comments at ISH11 [REP8-280] when he pointed out that no assessment had been made about the impact of Sizewell B's closure and the loss of the salient that has been established from the SZB/SZA outfalls. He contended that this would lead to the Sizewell shoreline naturally returning to a bay. This will then create coastal squeeze which will be exacerbated by, and have implications for, the integrity of SZC's HCDF.

CC.3.3 Question to the Applicant

Applicant's answer is set out in REP8-116:

TASC comment:

TASC consider that the Applicant's final comment in response to the question sums up the situation: *"In summary, therefore, the further details sought by TASC cannot and do not need to be provided. The approach adopted is robust and accords with best practice and guidance, and offers appropriate transparency."*

The Applicant's response offers zero transparency, so this is what they must mean by 'appropriate transparency'. TASC are not surprised by this offhand response and the Applicant's selection of a confidential assessment, as it replicates so much of what the local community have suffered at the hands of the Applicant throughout the SZC project, from pre-application to the current time. In TASC's Deadline 7 response to ExQ2 CC.2.5 [REP7-251] we provided a copy of the detailed carbon footprint calculation for the SZB dry fuel store [REP7-252] so we know a transparent methodology is possible if the Applicant chooses to adopt it. **How can IPs comment on a confidential document?**
