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**ACER (AFRICA)**

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**ATTENTION: BONGI SHINGA**

**COMMENTS: REVISED PLAN OF STUDY FOR NUCLEAR 1, NUCLEAR 2,  
AND NUCLEAR 3**

1. The revised POS states that impacts of decommissioning can only be assessed once decommissioning takes place, yet earlier in the same paragraph the criteria for the specialists studies states that the specialists must, where they are not certain, make educated judgments. If the specialists are incapable of making such judgments, should specialist who ARE capable of making such judgments/assessments (regarding decommissioning) not be appointed also? How can such a very real and primary impact concern be excluded from an environmental impact study simply because its potential impact is long term? Is the point of doing an EIA not for this very reason (ie to avoid excessive negative impacts)?

The revised POS states that the specialists have indicated that the impacts associated with decommissioning are too far into the future and therefore cannot be assessed at present. Is this very statement (by specialists) not sufficient proof of just what a long term impact these plants will have on our environment?

2. It goes on to say that the impacts and the management thereof (decommissioning) will be determined by the selected decommissioning strategy coupled with technological and legislative advancement. If the EIA is specifically not going to cover decommissioning then is the aforementioned statement backed up by any substantiated "decommissioning strategy" or technological and legislative advancement" or are we simply meant to hope for such technological, legislative and decommissioning strategies to take place in future? If this is the case, should the plan of study not also include the impact of possible poor, negligent and/or corrupt governance should South Africa's future leader(s) go down the wrong path? Such an occurrence could quite easily lead to no such advancements (in technology / legislation) taking place. This is not a very far fetched possibility and should be taken into consideration as a precaution, if this study elects to make such a bold statement as to base reliance on future developments/decision-making as a(n) [unqualified] mitigating measure.
3. The POS states that the specialists must recommend practicable mitigation actions that can measurably affect the significance rating and that they must recommend appropriate monitoring / auditing programs to check efficacy of mitigation objectives. How is it possible for them to recommend practicable mitigation actions and to recommend appropriate monitoring / auditing program(s) for the issues that cause most concern for the public

(decommissioning, which is not covered in the study and health impacts which are also not covered in the study)?

4. The POS states that design based accident scenarios will be established in consultation with Eskom (in consultation with potential vendors) and the NNR requirements. Is this not supposed to be an independent study? How can Eskom (and its vendors) be one of the specialists providing consultation?
5. The POS makes reference to assessment of impacts of proposed desalination plants which will be part of the infrastructure of the nuclear power plants. If the desalination plants are going to be required for the operation of the plants, will this study be viewing the combined impacts of the simultaneous operation of both the nuclear power plant(s) and desalination plant(s)? Or are the specialists only going to assess each one of the plants independently. It has been proven with mining that when EIA's are done independently and incrementally that major impacts can be overlooked. It should be a requirement of this study that all factors should be accounted for simultaneously. Why is this risk not mentioned in the study?
6. The POS states in a footnote that DEAT will not make a decision on nuclear safety, radiology, and radiation as these aspects are better placed within the regulatory process of the NNRA, and that to consider the same process in the EIA will be a duplication. If this is true, then the public should have a copy of what the NNR has found annexed to this EIA. This is again a primary concern for the public, yet, it is completely omitted from the study.
7. Again, another major concern for the public is evacuation times and emergency planning zones and the POS states that it will be Eskom who will determine these and that it will form part of the NNR process. Firstly, my same question, if this is an independent study, why is Eskom a consultant? Secondly, if this important aspect is being left to the "NNR" process, then the NNR's findings/assessments of this issue should be annexed to the EIA.
8. The POS states that one of the benefits that the nuclear power plants will bring is that they have significantly lower greenhouse gas emissions when compared to that of coal fired power stations. Firstly, this will be construed by many as "greenwashing" as not the entire life cycling (including mining, decommissioning, transporting of fuels, construction of cement enclosures for the reactors, etc) is taken into consideration when this was determined by the nuclear industry). Just as with the coal power industry, mining, transportation, etc is accounted for when calculating greenhouse gas emissions, so should it be with nuclear's uranium mining, transportation, building large cement enclosures for reactors, building desalination plants, etc. Also, why is nuclear only being compared to coal (worst polluter) and described as a 'pro' and not similarly compared to renewables (least polluting), and described as a 'con'?
9. The POS contains one short article on "Alternatives Assessed" and dismisses renewable in one single sentence. It also goes on to say that coal is not a viable option for coastal areas. It also states that renewables are not far enough advanced to provide large scale power generation facilities that can supply

reliable baseload power and that can be easily integrated into the existing power network in SA. Firstly, renewables cannot be compared to large scale power generation facilities. Implementing renewables will require a whole new decentralised approach to power production involving a combination of renewable energy solutions. Technology is in place for this already and wind and solar mapping studies have been done in SA and so have other studies on the production of hydro power and biogas from waste, etc. Where information is lacking in South Africa, information can be drawn from other countries which have these systems in place already. Why are there no specialists appointed in this study to cover possible alternatives? This does not seem subjective. Secondly, the POS states that renewables cannot be easily integrated. How can such broad unsubstantiated statements be made in the plan of study? Yes, we are aware that there is actually going to be no 'easy' solution to resolving our power crisis. Are we simply looking at which option is "easier", or are we looking at which option is more economically, environmentally and socially sustainable?

10. Lastly, the means by which the public is made aware of this study and report is insufficient and discriminatory. South Africa's special circumstances (in light of the history of apartheid rule) has resulted in an entirely different social dynamic in South Africa. A large part of the population is illiterate and not able to read newspapers. Many cannot even afford to buy newspapers. Also due to the injustices of the past, a large part of our population will not comprehend the meaning behind all of this. This process is discriminating against such people. Some form of independent unbiased program should be established (workshops) in poor affected communities to provide them with easy to understand factual information (in their own language) to assist them in developing their own opinions which will allow them the opportunity to comment during the comment period. Such a system should have been in place well in advance of the actual notices for comment going into papers.
11. I have not touched on the socio-economic aspect of this study, but trust that a lengthy specialist report will be included in the study taking into consideration all recent economic events (nationally and globally), the financial woes Eskom is facing, the need for jobs in South Africa, and the skills shortage in the nuclear industry?
12. I also have not touched on the very real remaining concern of how there is still no viable plan for the long term storage of high level radioactive waste and how this will be addressed in South Africa. I presume this will be covered, at length, in the EIR? Why is it not mentioned in the Plan of Study?
13. I would like to end by saying that the proposed comment period for the draft EIR is insufficient and unfair and does not allow the public enough time to review / assess the report. This revised plan of study alone was 40 pages long. How can we get through the entire EIR in 60 days? In addition, the study relates to 3 different sites, each with its own unique environmental considerations. This period should be extended to a minimum of 120 days.

Yours sincerely, N Potgieter, P O Box 6284, Roggebaai, 8012