



Nuclear Free Local Authorities Steering Committee

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NFLA Media release - for immediate release, 7th November 2012

NFLA joint submission on draft radioactive permits for proposed Hinkley Point C - the Environment Agency need to take on board key environmental concerns and improve their stakeholder engagement

The Nuclear Free Local Authorities (NFLA) publishes today its latest 'New Nuclear Monitor' which provides the core of its joint response to the Environment Agency's draft decisions and draft permits for radioactive discharges from a proposed new nuclear power station at Hinkley Point (1).

The Policy Briefing has been supported by a number of local NGOs, including the Stop Hinkley Campaign and CND Wales. It directly follows on from a submission made in December 2011 by the same groups to the Environment Agency outlining their concerns with EDF's (NNB Genco) proposed environmental discharges into the marine and airborne environment (2). This new submission now responds to the Environment Agency's draft decisions and drafts permits before the Agency make its final recommendations for the emissions and discharges from a proposed Hinkley Point C reactor.

The principal conclusions of the NFLA's original 2011 joint submissions by independent consultants Tim Deere-Jones and Ian Fairlie included:

- there are a number of highly significant weaknesses and flaws in aspects of EDF / NNB Genco's understanding of the behaviour and fate of those radioactive wastes, their proposed management of the discharges and their proposed sampling and monitoring programmes;
- there is a failure to address issues arising from climate change and the risks of severe flooding / inundation events;
- there are major data gaps about near field and far field radioactivity concentrations along the entirety of the Bristol Channel coast and about the potential impact of Hinkley C proposed radioactive waste discharges on the populations' resident in English and Welsh coastal zones;
- more consideration should be given to improving and making FULLY transparent the monitoring programme. It is definitely not enough that EDF propose to piggy back on the existing regime as that regime is inadequate and flawed. The status quo does not give the public an opportunity to protect their health through being informed on daily discharge levels nor does it allow the public to hold both site operators AND the regulators to account;
- according to the Environment Agency's EPR Assessment Report in 2009, it is expected that each year the proposed EPR-type reactor would emit to air 500 GBq (3) of tritium; 350 GBq of carbon-14; 800 GBq of radioactive noble gases and 50 MBq of radioiodines. These are relatively large amounts of radioactivity. If these releases were to occur, they would increase Hinkley B's current gaseous emissions by 20% (H-3) to 30% (C-14);
- the largest aerial emissions are usually of tritium in the form of tritiated water vapour, i.e. radioactive water. In recent years, many official reports have discussed the hazards of tritium - the radioactive form of hydrogen. In the past, this isotope had been regarded as only weakly radiotoxic: this view is gradually changing among governments and international agencies concerned with radiation exposures;
- in November 2011, German data revealed large spikes in radioactive gas releases during the refuelling of Nuclear Power Plants. According to the International Physicians for the Prevention of Nuclear War (IPPNW) in Germany (4), the normal emission concentration during the rest of the year is about 3 kBq/m³ but during inspection/refuelling this concentration increased to ~700 kBq/m³ with a peak of 1,470 kBq/m³. Nuclide emissions during the period of

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refuelling were about 65% of total annual releases. It is likely that noble gas concentrations can be used as a proxy for other gaseous emissions, including tritium and iodine releases;

- higher doses from these nuclide spikes go a long way to explaining the increased incidences of child leukaemias near Nuclear Power Plants shown by the German Government's KiKK findings. In the light of this German data, the 2011 NFLA joint submission recommended half-hourly emissions data from all UK reactors should be disclosed and that the issue of childhood cancer increases near Nuclear Power Plants be re-examined. The development of new nuclear reactors should be completely curtailed until such research is undertaken;
- in the context of all of these flaws the 2011 NFLA joint submission concluded that the proposed development in its current form should be rejected outright.

In analysis of the 2012 Environment Agency Draft Decision document Tim Deere-Jones concludes that:

- it does not address the great majority of the issues raised by the NFLA's 2011 Joint Submission;
- where it has addressed issues, it has done so by reiterating statements made in the ONR / Environment Agency Generic Design Assessment or interim approvals, but in no case has it specifically, and in appropriate detail, responded to the issues the NFLA have raised.

and that the Environment Agency either -

- does not wish to respond to the NFLA's 2011 Joint Submission's concerns;
- has no answer to the NFLA's 2011 Joint Submission's concerns;
- is unable to respond to the NFLA 2011 Joint Submission's concerns.

Independent marine environment consultant Tim Deere-Jones said:

"When the Environment Agency published their Draft Decision document I was very surprised to discover that their response to our scientific concerns failed to take into account, or consider the information and advice that the NFLA's 2011 Joint Submission had raised. Given the scientific evidence we have brought forward, and the failure of the Environment Agency to address that evidence, there can be no doubt that a wide range of important questions about the behaviour and fate of liquid radioactive wastes discharged into the Bristol Channel remain unresolved, and thus, there can be no confidence in the scientific rigour of the assessment and decision making process underpinning the Environment Agency's Draft Decision."

NFLA Chair, Councillor Brian Goodall said:

"The NFLA's joint submission contends that the Environment Agency have not adequately dealt with a whole raft of legitimate concerns made around the effects of radioactive discharges from a new Hinkley Point nuclear reactor into the marine and airborne environments. At the OSPAR Commission's Radiation Substances Committee meeting in January 2012 the NFLA were told by the UK Government and the Environment Agency that they would engage pro-actively with our detailed concerns. To our knowledge, there have been no proper stakeholder meetings since then, which is very disappointing. I call upon the Environment Agency to read our response and engage with NFLA and other concerned groups before granting EDF relevant permits."

Ends

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Notes to editors:

- (1) The NFLA's updated joint submission, New Nuclear Monitor 29, is attached with this media release and will be placed on the NFLA website.

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- (2) The NFLA's joint submission to the original Environment Agency consultations are on the NFLA website, and were drafted by independent marine policy consultant Tim Deere-Jones and independent consultant on the effects of radioactivity in the environment, Ian Fairlie – http://www.nuclearpolicy.info/docs/nuclearmonitor/NFLA_New_Nuclear_Monitor_No25.pdf http://www.nuclearpolicy.info/docs/nuclearmonitor/NFLA_New_Nuclear_Monitor_No26.pdf
- (3) A becquerel (Bq) is a unit of radioactivity: it means one nuclear disintegration (or decay) per second. Each disintegration results in the emission of radiation. One GBq means one billion disintegrations per second, and one MBq means one million disintegrations per second.
- (4) Credit goes to Christine Kamm MP in Munich, and the Green Party in Germany for obtaining this data, and to Dr Alfred Korblein in Nuremburg and scientists in IPPNW Germany for analysing it.

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