



Nuclear Free Local Authorities Steering Committee

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NFLA media release - for immediate release, 19th June 2013

Independent analysis of ONR's nuclear reactor design approvals raises serious concerns over sufficient rigour in the final phase of the process

The Nuclear Free Local Authorities (NFLA) has received a copy of the third and final review by the independent civil nuclear engineering consultancy, Large & Associates, considering the Office for Nuclear Regulation's (ONR) Generic Design Assessment (GDA) process to approve EDF's new nuclear reactor design (known as the European Pressurised Reactor or EPR). The NFLA are quite alarmed by some of its main findings. (1)

The three Reviews were commissioned by Wilkinson Environmental Consulting Ltd (WECL) through a grant provided by the Allan Wainwright Trust (AWT). The NFLA is grateful for WECL for commissioning this work, the AWT for funding it and to Large & Associates for undertaking such a comprehensive report over a long time.

The GDA process was developed by the ONR and the Environment Agency to consider the technical design issues and environmental matters with EDF's EPR design and Westinghouse's AP-1000 design (the AP-1000 process was put on hold in 2012) in a generic manner so as to resolve nuclear safety issues and speed up the construction process later on. Final-Design Approval Compliance (F-DAC) of the EPR design was given by the ONR in November 2012. (2)

Large & Associates's final report raises a number of serious issues with the manner and speed to which the final outstanding issues in the GDA process were resolved by the ONR. The report notes that:

- the final 13 outstanding GDA issues (of an original 31 issues extant in June 2012) were resolved just two weeks ahead of the required date for granting a F-DAC;
- the close-out letters for all 31 GDA issues are described by Large & Associates as 'perfunctory';
- many related 'close-out assessment reports' (COARs) remained unpublished until March 2013 - three months after the issuing of the F-DAC - making it impossible to identify which aspects of the GDA process had been deferred by the introduction of the 'large number of assessment findings (AFs)';
- between December 2011 and the issuing of final GDA approval in November 2012, 240 AFs were raised, these being in addition to the 484 AFs raised in the three year period upto the issuing of the Interim DAC. The six separate control and instrumentation (C and I) issues raised a total of 53 AFs but were identified in a single COAR which was stated as covering all C and I issues;
- 91 AFs were raised 'to be settled at some later date' in connection with the five Fault Studies COARs.

As the Final Review concludes: "The conundrum here is whether all, some or none of the subsequently raised 240 separate AFs were established in sufficient detail for the *Close-Out Letters* to be issued and, as a whole, to justify granting of the F-DAC in mid-December 2012 - this '*chicken-before-the egg*' poser cannot be resolved with the present level and detail of information accessible in the public domain."

One of the most concerning findings of the Review is contained in the following extract: "In effect, this AF deferral approach has lacked transparency at the time of the F-DAC grant and, moreover, in terms of nuclear safety the final performance of the plant (functionality, risk, effectiveness of protection, etc) will not be finally settled until well into the construction and, quite possibly, commissioning phases of the first EPRs scheduled for Hinkley Point. The existence of such

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uncertainties together with the quite obvious incompleteness of the plant design and development, particularly in the generic safety critical areas of Fault Studies and Control & Instrumentation must have, surely, rendered the GDA process itself incomplete and inconclusive.”

The NFLA is therefore concerned that any statements that the GDA process has been fully ‘completed’ is far from the reality. It is quite likely that a considerable number of serious technical issues with the design process have not been resolved but rather ‘parked’ for the individual site licensing process. In the NFLA’s view this puts into further question the Energy Minister Ed Davey’s approval of the Hinkley Point site at a time when it has two substantive legal challenges against it. (3)

A further issue of concern is the lack of openness and transparency with the final part of the GDA process. The Large & Associates report claims that “policy has been compromised by the manner in which the GDA process has been prosecuted”. The NFLA are concerned that this report does not provide reassurance that this final phase of the ONR’s GDA process has been fully open, transparent, accessible and robust. The NFLA calls on the ONR and the Government to consider the Large & Associates report in full and publicly respond to its content.

NFLA Chair Councillor Mark Hackett said: “The issues around the safety and security of proposed new nuclear reactors are paramount to local authorities and to the communities that will have to host them. Regulatory bodies like the ONR need to robustly justify the permitting of new nuclear reactors using the EPR design and this report shows to me that their any many serious nuclear safety issues which have not been at all resolved but rather left to a later date. The Government and nuclear regulators talk regularly about developing open, transparent, accessible and robust safety procedures to reassure the general public. This report shows why the NFLA and many local groups within the potential communities affected remain to be reassured by such statements.”

Ends

Further information:

NFLA Secretary Sean Morris on 07771 930196 or 0161 234 3244.

Notes for editors:

- (1) Large & Associates, ‘Final Report on the ONR Generic Design Assessment’, June 2013
<http://www.largeassociates.com/cz3206/3206%20GDA%20Review/R3206-13-04-06-13.pdf>.
- (2) ONR / Environment Agency Generic Design Assessment of Proposed New Nuclear Reactors
<http://www.hse.gov.uk/newreactors>
- (3) Energy Secretary Ed Davey approved the Hinkley Point planning application in April 2013. Greenpeace UK and the Irish National Trust / An Taisce have both put separate legal challenges in to the UK High Court on this decision.
For further detail see:
<http://www.thisissomerset.co.uk/Greenpeace-challenge-delay-Hinkley-Point-C-years/story-19146342-detail/story.html#axzz2WU0BxTBq> and <http://www.bbc.co.uk/news/world-europe-22381463>

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