

RESPONSE TO EDF IPC APPLICATION: NUCLEARCONSULT

REF ID 10014568.

Nuclearconsult comprise leading over 50 leading UK academics and experts in fields related to environmental risk.

We note our strong objection to the fact that the IPC rules don't allow objectors to raise any issues to do with nuclear power (as laid down in the government's NPS).

In this context, we are limited to the following topics:

- Effects of construction traffic
- Effects on landscape and the local environment
- Lack of economic benefit
- Effect on local services
- Lack of adequate emergency planning

Given the very short 500 word count for the response - we consider that the most important issue is **lack of adequate emergency planning.**

The Fukushima disaster led to the evacuation of an area of 20 kilometres (12 miles) and up to 32 kilometres (19.2 miles) to cover some outlying towns that the Japanese authorities were particularly concerned about. The French and US nuclear regulators suggested the evacuation zone should have been even larger – as much as 50 miles. This is considerably higher than current evacuation zones for UK civil nuclear reactors and is likely to take in Councils that do not have fixed nuclear sites in their area.

- **We consider that the evacuation zone plans are insufficient, and should be increased to the Fukushima evacuation zone size (or larger) than the present smaller zones in current plans**

It is highly possible that the host local authority / LRF for all UK civil nuclear reactors and military nuclear sites could be overwhelmed with the emergency response to a Fukushima type disaster. Mutual aid with neighbouring authorities across the region is essential.

- **We consider that the Community Risk Registers are insufficient and Emergency Planning Units / LRFs in outlying areas require additional training of key personnel.**

Large amount of equipment and open space that would be required in establishing decontamination facilities for cleaning the civilian population in the event of radiation exposure from a nuclear accident or a malicious CBRN attack. Other countries, like Sweden, have been considering the development of a public information campaign to educate the public on what to do in the event of a radiation exposure in terms of removing clothing and thoroughly cleaning the body.

- **We consider that the current public information programme is insufficient and more effective information should be made available on large-scale emergency decontamination operations.**

The Office of Nuclear Regulation (ONR) 2011 Interim Report notes, *“although there is potential for flooding to occur in the near vicinity of nuclear sites, the actual flooding risk is unknown because the detailed specific likelihood and consequences of flooding have not been assessed by the regulators”*.

- **Hinkley Point site is on a coastal location. Following the Fukushima incident, we consider that local / LRF flood plans are inadequate, and as a result, key elements of the local emergency plans are inadequate.**