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INTRODUCTION

The Congolese Civil Society of South Africa(CCSSA) is a registered NPO based in Cape Town. The organization has been established since 2015 and is more concerned about human rights, rights of asylum seekers, refugees and migrants, protection of world eco-system, and environment, promotion of African values. Awareness of negative impact of advanced nuclear technologies, climate change, the missing link of Hiroshima and Nagasaki and their impact on dignity of African population around the planet.

The CCSSA also concerned until now about the catastrophic disaster of the first atomic bomb dropped in Japan which was the introduction of the nuclear first generation highest risk of nuclear technology with evidence of massive killings and environmental negative impact. Scientifically, it has been demonstrated that artificial intelligence is capable to control any nuclear risk but fear of such risk remains point of concern in every nuclear power station.

Nuclear disaster has a massive capacity of killing similar to a tsunami and other natural disaster. The positive use of nuclear materials does not exclude the possibility of serious risks in the other hand because insuring safety on nuclear means sticking on a standard system of nuclear regulations.

Nuclear disasters cause damage on mankind and the environment of the same outcomes everywhere they happen. e.g first **atomic bomb**, the Fukushima Daiichi plant etc.... in the case of a nuclear disaster and none complies to efficient nuclear regulations, making the population being always first victim.



Hiroshima

Japan is one of the country who can be consulted very closely for nuclear disaster experience



Fukushima

AGEING PHILOSOPHY

The philosophy is one of the million reasons why the LTO should be considered, as mentioned in the report on page 44. The report is aware of the period of time of existence of the power plant being 40 years old and the report is insuring that the extension for 20 years should be taken in consideration, meaning the power plant will exist for 60 years with no participation of the victims.



- The 40 years of LTO mean that a process of nuclear standard regulation did match all the requirements with a clear report fully accessible to the first victim in case of a disaster, because the power plant is for the state profit. But when it comes to sensitive aspects of safety, the full control of power should be in the hand of the victims who must be aware of every report for the 40 years life of the power plant. All technical aspects for approval of the extension of the power plant are welcomed by ESKOM board. But potential victims board are selected with limitation; victims are not the decision makers for its life extension. Is it to the affected group to decide or the beneficiary one?
- People who did build the power station in 1976 surely set it for an operational period of 40 years and which was approved by the NNR. All safety related aspects were taken into consideration by the builders, while safety is the main central point to who ever is concerned on the historical risk which may cause a disaster at a given nuclear power station. The actual requirements are a probability to operate beyond 40 years.
- Builders of Koeberg power plant, the NNR and the energy department, if they believe that there is a life limit of the nuclear power plant. Then safety should be taken very seriously. So the condition of life period estimate is based on safety, meaning 40 years should be the limit of the first safety experience of a power plant test and 20 years for the extension is the coming next for unknown experience of test in term of safety. Builder gave 40 years of the power station life, and the extension is not the same 40 years, meaning. there is a progressive credit of doubt for the safety of the plant which can not be extend for 40 years, but only 20 years. In conclusion. there is no 100% of safety approval. Also, there is no clear percentage estimation of unsafe state of the Koeberg station for 20 years because of the ageing philosophy; the ageing structure and systems can predict a disaster, because is no longer in it's primary state.

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If the 40 years power station life could not provide a report without black mark page showing like disclosure information to the victims who are the main priority of LTO? Without any disclosure document, how can the public comment and provide an accurate and a strong information which can challenge the seriousness of the safety concern which is the main reason of the extension of a nuclear power globally. **An incomplete and no access of information is equal to comment at all.**

CARBON EMISSION TARGET VS NUCLEAR RISK

Climate change is the primary challenge mankind is facing right now. That is why for a transitional plan, carbon emission is the main target which is a way forward for solution on climate change but the replacement of that should not be the promotion of nuclear power station because the huge challenge of permanent safety concern is still a no access to the victims.

RECOMMANDATION

- We suggest that the LTO should wait until all victims are aware of the fully information provided in the lowest way of understanding for the full freedom of comment, in different languages, reaching all areas at the same. Applying as during election time where information reach everywhere.
- Probability of 1 or 2 years for better assessment for insuring full safety concern.
- The reason of choice of the location should be considered as well, because the reason of the past which made Koeberg to be built where it is right now is no longer relevant and solid reason in our day. There is now population around 16 kilometer and if it can be located far away from population for safety purposes in the case of a disaster that will be a good strategy of prevention.

CONCLUSION

Victims have the full right to decide on anything concerning the extension or the location of the power station.

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