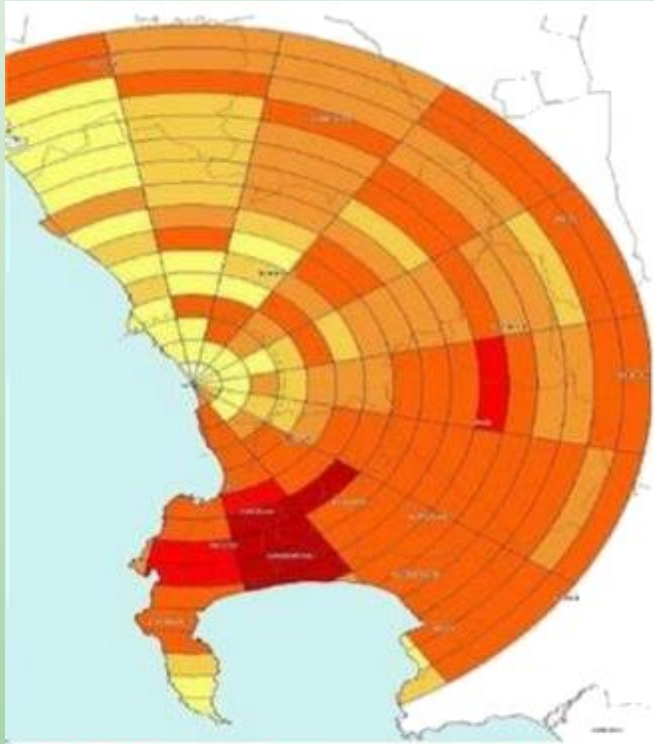


NNR PUBLIC HEARINGS: KOEBERG LTO



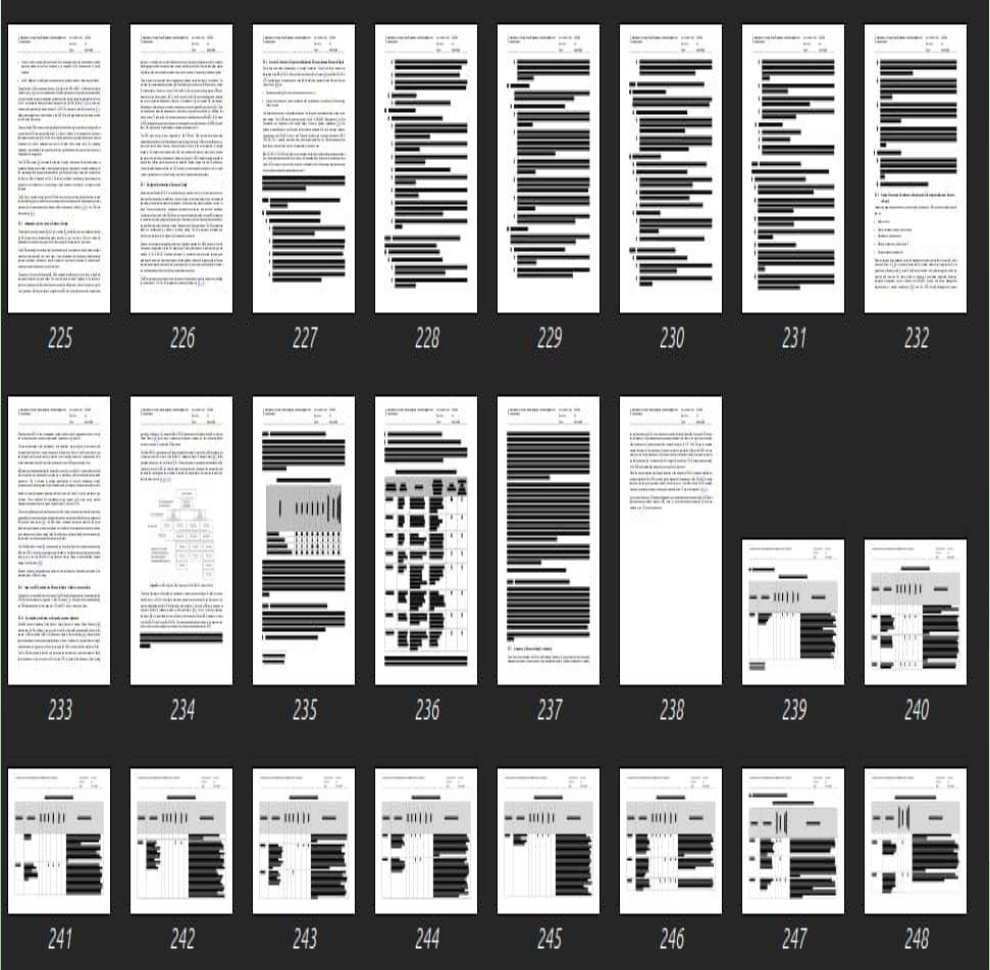
Belthorn Community Hall
Crawford
Athlone
17 February 2024

K.A.A.

KOEBERG ALERT ALLIANCE



The key to a meaningful public engagement is informing the public, but we stand here as the public once again asked to make comments on the life extension with incomplete information available to us... It started with the first comment period in March 2023, when the public were asked to make comments. At that time, the only version of the safety case was blacked out in hundreds of places. Civil society rejected that comment period and called for it to be scrapped. We know Eskom had no intention of releasing the safety case at all, and it was only because the NNR exercised its power that Eskom was forced to release it. We are grateful to you as the NNR for doing this, but you did not go far enough...



Redacted safety case cont...

You allowed Eskom to make blacked-out sections of the safety case, in a way that was obviously designed to deceive us.

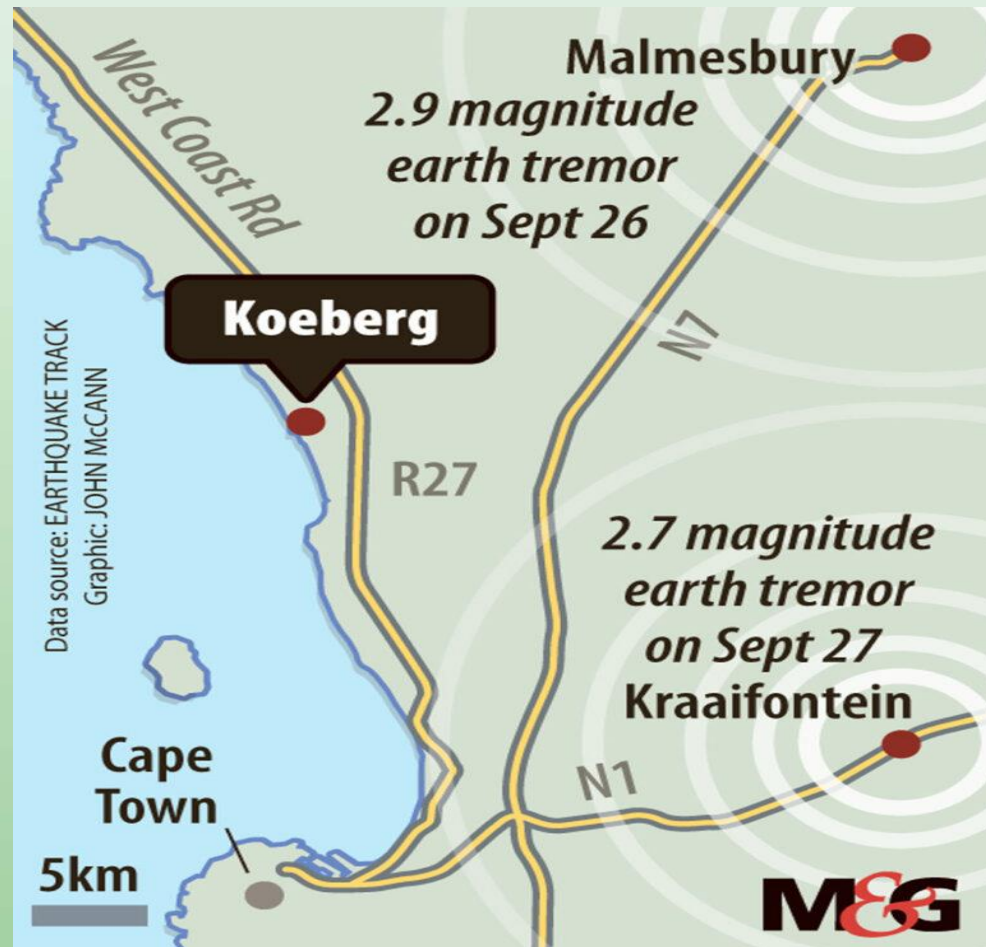
I must not make an accusation without an example, so here is one from Page 186:

It says “it is safe to continue operations... followed by a blacked out bit. Later releases showed the blacked-out bit said “provided that there is the timely implementation of the safety improvements contained in the LTO Integrated Implementation Plan”



Now, we still have incomplete information. We know that an earthquake is a big risk for a nuclear plant, but Eskom has still not completed a study of the risks of an earthquake. In 2020, Cape Town was struck by several earthquakes as illustrated on the picture.

In an interview, published in the Mail&Guardian, ex-nuclear officer, Mr Riedewaan Bakardien said:
"Although there is an appreciation of the potential risk, calculations indicate that such risk is minuscule"
Calculations... based on what? If the risk assessment is still not available?



Continued...

Eskom being late is not our problem, and you as the NNR, should not try and rush the public, because Eskom cannot get it's act together in time.

We expect you, as the NNR, to look after the interests of the communities, and not bend over backwards to try and please Eskom.

It is really simple – the NNR should ensure ALL information is in the public domain BEFORE you start any public comment period.

You have failed to do that.

Instead, civil society has to pay lawyers to force documents to be released. There is much more information that is still being withheld, but let me move on since the time is very limited here.



When it comes to safety issues, we know there are several layers which are designed to protect the public.

1. The first is the reactor vessel
2. The second layer is the containment building.
3. The third layer is the emergency and evacuation plan.

For the reactor vessel, we have read that cracks have been found in similar reactors in France. In one reactor, a 23mm deep crack was found in a 27mm thick metal. The French Nuclear Regulator became concerned and has been putting pressure on the plant operator forcing checks of the entire fleet.



Continued....

We hope that our NNR has the same level of concern about cracks in the high-pressure pipes at Koeberg.

As far as I can tell, Eskom has no plans to replace the reactor pressure vessel or all of the high-pressure pipes.

If there is a leak there, we then have the containment building to stop radioactive material leaking into the surrounding communities.



The Containment Buildings

This is our biggest worry. Once again, Eskom tried to hide a report on the crack in the containment building, but were finally forced to release it under threat of legal action. Eskom's own report from 2022 said they found a 110 metre long crack, all the way around the top of the dome on Unit 1. The same report said this: 🙅🙅

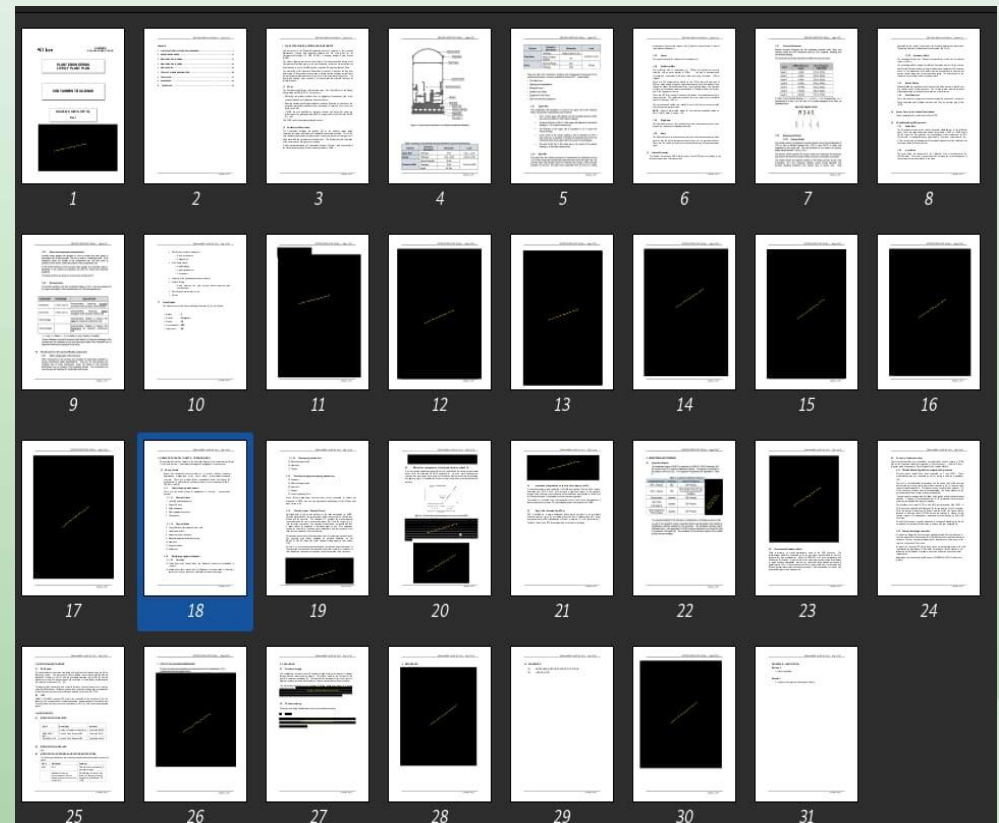
4.3 Current vs. Optimum or Ideal

The current interventions are neither ideal nor sustainable; as such there is a CURA Risk on the structures (which gets reported at Executive Level). The Risk is level I (highest), with a Consequence Level 6 (highest), and likelihood level B

4.3.1 Chloride Induced Degradation, mitigation and prevention

Currently, patch repairs have been completed on 1 and 2HRX. These maintenance works are conducted as part of a project under an Equivalency [19].

The work is not sustainable nor permanent, as the anode (part of the structure which corrodes) 'moves' next to where the anode used to be, i.e. the area which the patch repair is applied to. The repairs are non-structural and only about 11% of the structures' surfaces have been rehabilitated. The areas adjacent to the patched areas will now corrode at an accelerated rate.



Cont...

I don't understand all of that, but it does not sound good. The International Atomic Energy Agency was also worried about this when they visited recently. They found that the equipment monitoring the containment building was broken. Using very polite language, they wrote:

"Without a fully functional containment monitoring system, the data required to demonstrate structural integrity of the containment during LTO, may not be sufficient."

How can you, as the NNR, allow this?

I have also been told that the only way to FULLY REPAIR rusting metal reinforcing rods in concrete, is to demolish and rebuild it. This will be very expensive to do.



Cont...

Will you insist on it? If it is the only way to make the structure as safe as when it was built, or will you allow the cost of a proper repair to influence your decision?

Please answer my question after my presentation.

So we are not confident that the containment building will protect us. If it does fail, then we still rely on the evacuation plan



The Evacuation Plan

The evacuation is a bit of a sad story. Every 18 months there is a drill to see if the plan can work. Every time the exercise results in a failure. The last drill was in November 2022 and we were told at the Public Safety Information Forum that the NNR found 14 “noncompliance“

Here are two of those:

- The equipment needed to decontaminated people was not even in Cape Town.
- The City Department did not even arrive because it was not a real emergency.

We were told:

- The report will not be made available to the public.

This makes us ask:

- who’s side is the NNR on? Why do they hide safety-related information from the public?

Will you also answer this please?



Cont...

Liz McDaid spoke in Table View two weeks ago, about seeing the same problems year after year during the emergency drills. She said how she asked to engage with the NNR about her observations, but she was simply ignored. This makes me wonder if the NNR takes this emergency plan seriously.

Why doesn't the NNR follow the practices of other countries? If the drill was in the USA, Koeberg would have been shut down a long time ago. But here, the attitude of the NNR seems to be "We hope they do better next time". If there was a major accident now, we know that the plan may not work. Even on a sunny day, when everyone knew the drill was going to happen, it did not work. What if it happens on a stormy Saturday night when no one is expecting it?

We ask that the NNR make sure Eskom do not have lower safety standards for Koeberg than other countries have for their nuclear reactors.



I am not sure how legal things work. I hold no degrees or a Ph.D but for me, from a moral point of view, I will hold you, the NNR board members, personally responsible if people die because an evacuation is needed and you have failed to make sure a good one is in place.

So will you, as the NNR, insist on the drill being done again, and that it must work without any "non-compliance? "

Please, answer that now, so that we can feel you are really keeping us safe.

THANK YOU!

