National Nuclear Regulator

Report

Representations received during the NNR Public Consultation pertaining to additional information submitted by Eskom for Koeberg Unit 2

TR-NPP-25-008

Rev 0

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1 INTRODUCTION

On 10 May 2021, the NNR received an application (Koeberg LTO application) from Eskom to operate the Koeberg Nuclear Power Station (KNPS) beyond the initial 40-year design life or licence term of the facility for an additional 20 years. The licence term for Unit 1, which was subsequently renewed, expired in July 2024 and the license term for Unit 2 will expire in November 2025.

In accordance with the provisions of section 21 of the National Nuclear Regulator Act no.47 of 1999 the NNR Board implemented a public consultation process for the Koeberg LTO application. The first phase of the consultation process, involving a public notice and commenting, started in April 2023. After the notice and comment stage the NNR Board took a decision to hold public hearings to afford members of the public an opportunity to make representations on health, safety and environmental issues connected with the LTO application.

The NNR held two sets of public hearings in 2024. The first set of hearings were held on 3,10 and 17 February 2024 in the Western Cape. The second set of hearings were held on 3 and 4 June 2024 in the Northern Cape as well as on 6,7 and 8 June 2024 in the Western Cape.

On 26 July 2024, the NNR announced the decision to grant LTO for Koeberg Unit 1 only and deferred the decision on Unit 2 till before November 2025.

Further to the public hearings held in 2024 and the deferred decision on Unit 2, the NNR received an additional information from Eskom in connection with the LTO application. Upon receipt of the additional information, the NNR invited members of the public and interested and affected parties to submit written comments on health, safety and environmental issues pertaining to the additional information submitted by Eskom for Koeberg Unit 2.

The NNR held a third set of hearings comprising of 5 sessions which were held on 29 and 30 September 2025 in the Northern Cape province and on 2,3 and 4 October 2025 in the Western Cape province respectively.

An overview of the key public consultation activities undertaken are presented in the following table (refer to Table 1).

Table 1: Overview of key public consultation activities

#	Activity	Date
1.	Publish notice in Government gazette inviting public representation	17 July 2025
2.	Media advertisement in newspapers and radio announcements in English, Afrikaans and isiXhosa	27 August 2025 to 29 September 2025
3.	NNR stakeholder notification letter of public hearings	14 August 2025
4.	NNR information sharing session at Vaalputs PSIF	21 August 2025
5..	Public hearing in Kamiesberg, Northern Cape	29 September 2025
6.	Public hearing in Concordia, Northern Cape	30 September 2025
7.	Public hearing in Tableview	2 October 2025
8.	Public hearing in Athlone	3 October 2025
9.	Public hearing in Atlantis	4 October 2025

The representations received from members of the public as well as interested and affected parties were assessed and the outcomes are presented in this report.

2 PURPOSE

The purpose of this report is to record the written comments received and representations made by interested and affected parties and stakeholders emanating from the 3rd set of public hearings in connection with LTO application and the additional information on Koeberg Unit 2 submitted by Eskom. The report also presents outcomes from the assessment of the representations.

3 SCOPE

This report deals with the analysis and outcomes of the representations received in response to the additional information submitted by Eskom for Koeberg Unit 2.

4 ABBREVIATIONS

AMP: Ageing Management Programme
ASME: American Society of Mechanical Engineers
DSSR: Duynefontein Site Safety Report
EdF Électricité de France
EIA: Environmental Impact Assessment

EQ:	Equipment Qualification
ICCP:	Impressed Current Cathodic Protection
ICRP	International Commission on Radiological Protection
ILRT:	Integrated Leak Rate Test
LTO:	Long Term Operation
NECSA:	Nuclear Energy Corporation of South Africa
NEMA:	National Environmental Management Act
NUM:	National Union of Mineworkers
PID:	Public Information Document
PSA:	Probabilistic Safety Assessment
SAFCEI:	Southern African Faith Communities Environment Institute
SALTO:	Safety Aspects of Long-Term Operation
SAYNPS	South African Young Nuclear Professional Society
SRA:	Safety Reassessment
SSCs:	Structures, systems and components
SSHAC:	Senior Seismic Hazard Analysis Committee
TISF:	Transient Interim Storage Facility
TLAA:	Time Limited Ageing Analyses

5 DISCUSSION

5.1 Overview of representations

A total of hundred and fifty (150) representations (written comments and oral presentations) were registered up until the closing date on 20th of October 2025. The representations were made by civil society organisations, public interest groups, members of the public and industry bodies/associations.

During the five (5) public hearing sessions conducted, the NNR received forty-three (43) oral representations from registered interveners.

The comments from the written submissions were collated, including the representations registered at the hearings. All comments have been allocated to common themes for ease of administration and for the purpose of providing responses where relevant and or appropriate. It must be noted that during the third set of public hearings the NNR identified several repeated information and comments which were previously submitted to the NNR during the 1st and 2nd sets of hearings in 2024. All repetitions including new representations were registered and are included in the report.

5.2 Representation Statistics

A summary of the statistics and categorisation of the representations received is presented as follows.

- The NNR received 150 representations and extracted 822 comments from the representations. Some representations were identified as repeat comments (i.e. representation submitted as well as duplicated/covered at the hearings, or statements/requests unrelated to the application.

- Of the 822 comments extracted, 48 was considered not applicable, and the balance of comments (774) were considered applicable.
- Of the 774 applicable comments there were 408 from individuals commenting in their private capacity and 366 comments from NGO's, organisations and community representatives (Refer to Figure 1).

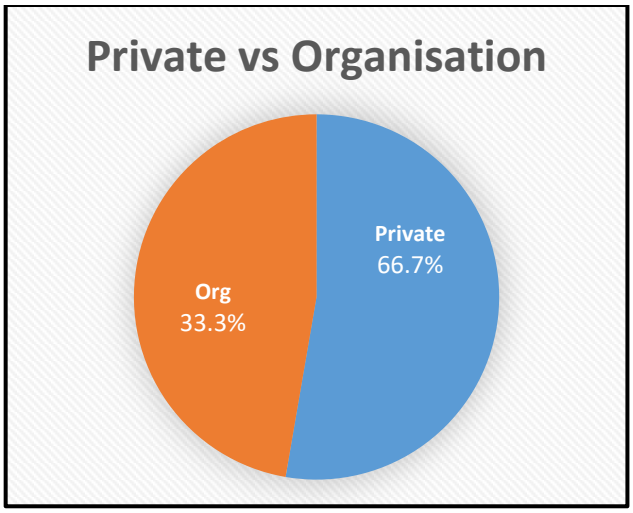

Figure 1: Categorisation of comments according to affiliation - Private vs Organisation

- Refer to Annexure A for the record of representations received.

Representations considered not in support of Koeberg LTO were received from the following environmental, social and faith communities:

- Agri Gamoep
- Agri Namaqualand
- Agri Noordkaap
- African Climate Alliance
- Atlantic Beach estate
- Gods Angels Reaching out Organisation
- Kamieskroon Farmers Union
- Kliprand Landbouvereniging
- Laudato Si' Movement South Africa Chapter
- Movement for Debt and Reparations
- Platbakkies Boerdery
- Platbakkies Farm Retreat
- Project 90 by 2030
- The Green Connection
- The Koeberg Alert Alliance
- The Southern African Faith Communities Environment Institute (SAFCEI)
- Ubuntu Rural Women and Youth Movement
- Unisa
- Saldanha Bay Community
- Spoegrivier Boerevereniging

Representations showing support of Koeberg LTO were received from the following stakeholder groups or organisations.

- Department of Trade, Industry and Competition (DTIC)
- South African Young Nuclear Professionals (SAYNPS)
- South African Nuclear Energy Corporation (NECSA)

- National Union of Mineworkers (NUM)
- National Union of Metal Workers of South Africa (NUMSA)
- Solidarity
- Ward Councillor
- Some private individuals

5.3 Relevance and Applicability of Representations Received

Of the applicable comments extracted, not in support of LTO, 454 can be characterised or classified as non-technical or generic, 320 technical or specific in nature, and 11 in support of LTO.

The comments were considered and grouped into themes. Refer to Annexure B for the list of themes. The grouping approach serves to highlight the public's interest in specific safety issues or common aspects connected with nuclear energy and Koeberg LTO. Comments directly relating to health, safety and environment, were categorised as technical or substantive in nature.

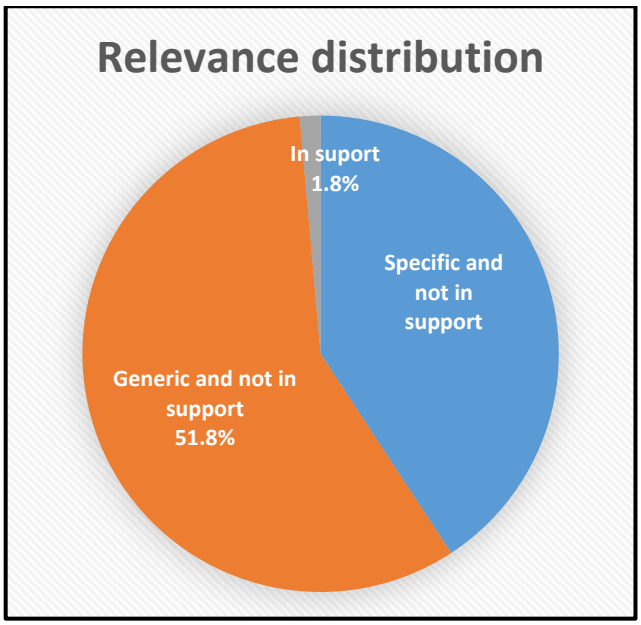

Figure 2: In support vs not in support

5.4 Comments relating to Health, Safety and Environment

The evaluation and grouping of the 774 comments not in support of LTO indicate that 19 comments related to health, 242 related to safety, and 90 related to environmental issues.

General comments not directly related to health, safety or environment were regarded as non-substantive and accounted for 423 comments. When the distribution is compared to the comments received during the January 2023 public notification period when the public was invited to comment on the application and the 2024 hearings, it reveals a strong correlation, with a slight increase in feedback concerning health, safety, and environmental issues (Refer to Table 2).

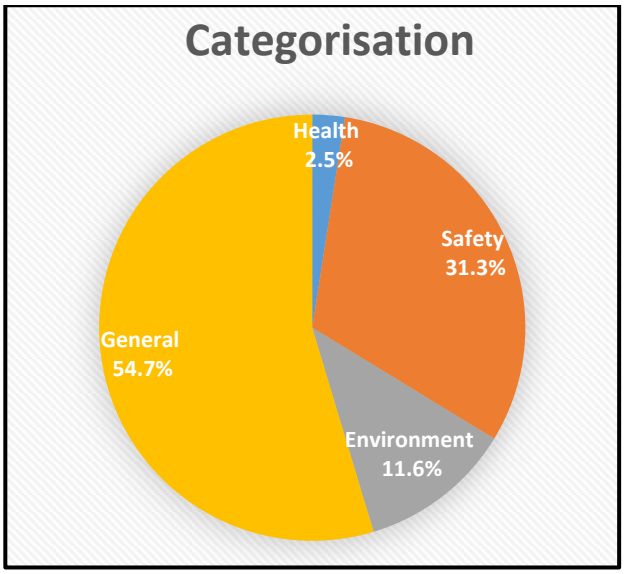

Figure 3: Categorisation of comments into Health, Safety and Environment

Similar as was the case during the 2nd phase of hearings, the increase seen during the 3rd phase is attributed to the extent of comments that was received from the communities around Vaalputs contributing mostly to health, safety and environmental impact concerns.

Table 2: Categorisation of comments into Health, Safety and Environment for different sets of public hearings

Categories	Received during 1st phase (Notice and comment) in March 2023	Received during 2nd phase (Public Hearings) in February & June 2024	Received during 3rd phase (Public Hearings) in September and October 2025
Health	2.6%	2.1%	2.5%
Safety	31.7%	33.7%	31.3%
Environment	7.3%	8.2%	11.6%
General	58.6%	55.9%	54.6%

6 REPRESENTATIONS ON HEALTH, SAFETY AND THE ENVIROMENT

During the hearings various issues related to the LTO application in general and applicable to both units were raised. This is despite the notice for the hearings indicating that the scope is limited to the new information related to Unit 2. However, all the comments raised were recorded and are included in the assessment presented in this report. Similar to the hearings held in 2024, some information that was presented or commented on needed clarification. For example, to provide more clarification related to the hearings conducted in 2024, the NNR documented responses and provided information related to the main technical issues, with the aim of providing correct technical information where there was evidence of misrepresentation or wrong contextualisation of concepts (refer to TR-NPP-24-003). This report on the outcome of the 2025 hearings related to Unit 2, where applicable and appropriate, will reference some of the responses made in TR-NPP-24-003.

The representations and comments extracted were grouped by themes and are listed in Annexure B. There are existing themes, originating from the 2024 public consultation process as well as new themes emanating from the current set of consultations. When the themes are ranked, as was done in TR-NPP-24-003, the following dominant themes are evident (refer to Table 3):

Table 3: Categorisation of comments according to various themes

Issue No	Themes
1	Vaalputs
2	Emergency planning issues
3	Public consultation process
4	Technical documents and issues
5	Nuclear waste issues
6	Lack of and access to information
7	EIA consideration
8	Regulatory framework
9	NNR mandate, transparency and the Board
10	Safety of communities

When the data distribution of the top themes of 2024 (refer to TR-NPP-24-003) is analysed, it shows an even spread of data across the top 4 themes, with the top theme attracting 11.2% of the comments and 2nd placed theme 10.6% of the comments. In the case of the data for 2025 (refer to Appendix B) it shows a focussed shift with the top theme dominating and attracting 19.6% of the comments and 2nd placed theme 11.8% of the comments.

The data behind the Vaalputs theme also shows that 32.8% of the representations received were from individuals and communities residing from the Northern Cape and West Coast.

The concerns around Vaalputs varies but is mostly related to issues of historical lack of public involvement in the decisions related to Vaalputs operations, transport risks, future storage of high level waste, infrastructure of the area and contamination of the environment.

There is no clear differentiation between the roles of and responsibilities between NRWDI and the NNR, including that there are different legislative requirements and separate responsibilities for the two organisations. The difference in responsibilities among the various licence holders who are part of the waste management chain is also not fully understood.

After the hearing in 2024 the NNR indicated that the role of the emergency plan and the connection with safety is not widely understood and that an effort must be made to further educate the public on the role of the emergency plan in the overall management of an accident and importance in terms of safety. Similarly, more education and communication are needed considering comments raised on important aspects regarding the public consultation process, understanding of the Regulatory framework, the lack of and access to information and on issues around the NNR mandate, transparency and the Board.

The sharing of accurate and clear information, educating the public on nuclear concepts and building trust through increased transparency and demonstration of integrity should remain a key focus.

The NNR identified a need to re-clarify the following topical issues, considering the additional information provided by the Applicant (Eskom), which was the basis of the comments considered at the hearings.

6.1 Containment related

6.1.1 Dome cracks

The circumferential crack near the edge of the containment domes has been repaired and is being monitored. Eskom has confirmed and justified that the crack does not compromise the structural integrity or leak-tightness of the containment structure. Furthermore, inspections have demonstrated that the crack is stable and shows no signs of propagation.

The leak-tightness of the containment structure is not affected by the crack, as this function is ensured by the inner steel liner. The concrete structure provides for the structural integrity required as well as shielding function for the containment.

Eskom has substantiated in its Long-Term Operation (LTO) safety case that the integrity of the containment structure remains uncompromised. Structural assessments or safety analyses indicate that the identified cracks have no significant impact on the structural behaviour, and do not in any way undermine the containment's integrity.

6.1.2 Containment monitoring instrumentation

Over the years, some parts of the containment buildings have undergone gradual and localised degradation of concrete, accompanied by the progressive loss of embedded monitoring instrumentation. This includes strain gauges, dynamometers, pendulums, and temperature sensors. While these instruments are not essential for determining the real-time operability of the containment structures, they play a critical role in the long-term assessment and monitoring of the containment's structural integrity.

Although some of the monitoring instruments are defective, it has been verified that the remaining devices can capture long-term trends in the structural behaviour of the containment. Nonetheless, the limited number of operational instruments raises concerns, particularly as additional equipment may become non-functional over time. To address this, the existing containment monitoring instrumentation has been refurbished and restored.

As an interim measure, the applicant has installed additional modern technology strain gauges on Unit 1 and will implement the same on Unit 2 in preparation for the ILRT.

Regarding the Unit 2 containment online monitoring, the status below refers:

1) The existing monitoring system was refurbished (dynamometers, pendulums, invar wires). The strain gauges are embedded in the concrete, therefore cannot be replaced. In their place the applicant installed vibrating wire strain gauges in the same position on the dome and walls, and these are more accurate than the original strain gauges.
2) The fibre optics strain gauges will be installed for ILRT and left in situ after the ILRT.
3) Every 3 months the applicant monitors the containment online monitoring system in line with licence conditions and international practice.

Eskom is further required as part of the Unit 1 decision to implement a modification to further improve the quality of data from these instrumentation as per regulation 4(e) of

the LTO regulations. The modification is planned to be implemented during the maintenance outages 129 and 229.

In general, critical structures, systems and components (SSCs) required to monitor containment conditions and to ensure operability of the 3rd barrier during normal and accident conditions are periodically tested. These SCCs are governed by the KNPS operating technical specifications, a licence binding document, that have strict shutdown requirements if instrumentation becomes unavailable.

6.1.3 Impressed current cathodic protection (ICCP)

The containment building has been identified as a civil structure important to safety with ageing mechanisms that pose a risk if not treated in a timely manner. The containment buildings are subject to chloride-induced degradation of concrete for which historic repairs were already implemented. The long term proposed solution however is to install an impressed current cathodic protection (ICCP) system on the containment buildings to mitigate against chloride-induced degradation of concrete. This modification is currently in the testing and design phase.

In the safety case for containment re-analysis the applicant has assumed that the post tensioning tendons are not affected by corrosion over the evaluated 20 years (i.e. LTO period). Since installation of the ICCP system will ensure that tensioning tendons are not affected by corrosion during the LTO period, the applicant has been required to implement the ICCP system to mitigate against chloride-induced degradation of concrete as a long-term solution. The design of the modification is at an advanced stage.

The management of ageing is currently achieved through an approved ageing management programme that includes the monitoring, testing, surveillance and repairs as may be required to ensure that assumptions in the containment integrity analyses remain valid for the period of LTO.

6.1.4 Integrated Leak Rate Test (ILRT)

At KNPS the rules and engineering practices applied for in service inspection and testing of the containment buildings conform to the codes and standards developed and published by the American Society of Mechanical Engineers (ASME). These rules require that the ILRT test is typically performed once per interval (10 years). The US guidance allow this interval to be increased to a maximum period of 15 years. However, this has not been adopted in South Africa. To accommodate scheduling, outage timing and operational challenges to the normal interval of 10 years, the rules allow a grace period beyond the normal 10-year interval. In accordance with the US

rules, it could be up to 15 months but the applied grace period in South Africa is 9 months.

The ILRT at KNPS is only planned to be performed post LTO due to the scheduling rules allowed for an interval. The ILRT, as previously reported by the NNR also do not form part of the required tests for the TLAA assessment to demonstrate the structural integrity and the continued operability of the containment structures. The primary technical reason for this is that ILRT tests provide information on the structural behaviour over a short period of time (i.e. during the conduct of these tests, the structural behaviour is only measured over a 24 hour time period only), whereas what is important for TLAA analysis is the behaviour of the structure over a very long time period (i.e. in the order of months to years). Furthermore, during the conduct of ILRT tests, the containment is pressurized, which is not representative of the actual ageing condition of the containment. Nevertheless, the ILRT tests do provide some indirect information on structural behaviour that can be used to complement TLAA analysis, such as confirming the linear behaviour of the containment. Consequently, where relevant and or applicable, data collected from past ILRT tests were used by Eskom to validate TLAA 301.

The ILRT will continue to be scheduled during the LTO period to monitor the leakage from the containment building, condition thereof and to validate the structural integrity and the data that is being used. Leak rate tests that focus on systems and containment penetrations are performed every outage.

6.1.5 Compliance of the application with the LTO Regulations

A concern was raised that due to the lack of Unit 2 dome data, the delay with the scheduling of ILRT, and implementation of the ICCP post LTO decision, that the applicant is unable to demonstrate full compliance with the LTO regulations.

In any analysis or analytical model of a physical phenomenon, simplifications and assumptions are made. For example, when a new facility is licensed, the safety case assumptions are primarily based on other similar facilities and/or prototype test facilities. In line with international practice and IAEA standards the NNR requires that good engineering practice be applied and that safety analyses are demonstrable conservative and that the analyses against design criteria should be conservative, and where appropriate sensitivity analyses are to be performed. The NNR review of TLAA considered all these provisions and in addition performed independent structural response analyses. Through these analyses, the NNR independently verified that for Unit 2, based on both predictive data analysis and the empirical material testing, there is adequate evidence to confirm that the structural integrity of the containment building is sufficient to support safe operation during LTO.

The LTO safety case further demonstrates compliance with the NNR principal safety criteria. The LTO safety case includes the outcome of the 3rd PSR global safety assessment demonstrating overall safety considering the period of LTO specifically for the fourteen prescribed safety factors against current standards and practices. The information credited to formulate the overall assessment is obtained from the 3rd PSR, SALTO assessments, KNPS design, demonstrated management of ageing, adequacy of operational programmes, impact from external hazards, adequacy of emergency planning, availability of resources, knowledge management and mature integrated management system.

6.2 Nuclear Waste related

6.2.1 Vaalputs National Waste Disposal Facility

The Vaalputs National Waste Disposal Facility is operated by NRWDI under a licence issued by the NNR. The licence authorises NRWDI to receive Low Level Waste (LLW) generated from nuclear research, medical and industrial applications, as well as nuclear facilities such as KNPS. The facility currently accepts solid or solidified low-level waste (LLW) that has been properly characterised, conditioned, and packaged in accordance with the Vaalputs Waste Acceptance Criteria. The primary sources of this waste are the Koeberg Nuclear Power Station (KNPS) and the South African Nuclear Energy Corporation (NECSA).

The potential impact from natural hazards was assessed during the initial site characterisation of Vaalputs. Particular attention was given to evaluating the adequacy and integrity of the underlying assumptions, especially those concerning seismic activity. The design basis for the Vaalputs National Radioactive Waste Disposal Facility for Low Level Waste is based on the worst-case seismic event of magnitude 6.3 that occurred in Ceres in 1969. Based on this magnitude, it was calculated that a seismic event as large as the Ceres one with an epicentre at the Vaalputs disposal site will cause no damage to the waste drums and its contents and therefore will not result in any release of radioactivity to the biosphere or geosphere.

No other KNPS waste type is allowed to be shipped to or disposed of at Vaalputs. Any future proposals or plans to amend the licence to accommodate additional waste types will be subject to the relevant regulatory procedures, which include public consultation as appropriate.

6.2.2 Transport of waste

Transport requirements related to the waste that is received from KNPS is done under the auspices of the KNPS licence. The process and standards applicable cater for protection of the public against unnecessary risks due to the transport activity on public roads. These include aspects related to security, radiological protection and emergency response requirements.

6.2.3 KNPS Waste

KNPS produce nuclear waste classified as low, intermediate or high level. As indicated, KNPS classified low and intermediate level waste are treated and temporarily stored at KNPS until shipped to Vaalputs in accordance with the requirements and the respective waste acceptance criteria.

The associated waste packages meet stringent regulatory acceptance criteria, ensuring that waste is safely transported in accordance with the KNPS licence and disposed of in full compliance with the Vaalputs Waste Acceptance Criteria.

KNPS high level waste is not allowed to be shipped from KNPS and are stored on-site, either in spent fuel pools or in dry storage casks. Once established in the future the high-level waste will be transferred to a centralised interim storage facility (CISF), which is being established by the National Radioactive Waste Disposal Institute (NRWDI) in line with the Radioactive Waste Management Policy and Strategy of South Africa (2005). The licensing and authorisation of the CISF will be subject to the required regulatory processes and involve public consultation as mandated by the Constitution and laws of the country.

In the short term, a transient interim storage facility (TISF) is being established within the Koeberg site, to ensure that sufficient dry cask storage is available for the period of LTO until the CISF is fully operational.

6.2.4 Association of LTO with Vaalputs

The storage of high-level waste, potentially at Vaalputs and the link to the LTO licensing process was raised as a concern during the public consultation process. In terms of the Radioactive Waste Management Policy and Strategy of South Africa (2005), nuclear fuel that has been irradiated in a nuclear reactor is called “used fuel” instead of “spent fuel”. The used fuel is currently stored in authorised spent fuel pools on site as well as in casks designed and constructed for the storage and transport of used fuel. Eskom has applied for the Licensing of the Transient Interim Storage Facility (TISF) on the Koeberg site to create additional storage capacity.

Conditions 4.10 and 4.11 of NIL-01 regulate the storage of new and used fuel on site and require that the Operator must ensure that there is enough storage space in the spent fuel pools before a new operating fuel cycle commences. To meet this licence condition Eskom applied for the licensing of the TISF with phase 1 construction having been granted. The design capacity of the TISF is for providing adequate storage space for the additional used fuel being generated during the period of LTO.

The prospective licensing of the CISF is for the long-term storage of used fuel on an off-site facility licensed for that purpose until a future decision is made on the various options for safe management of the used fuel in line with the relevant national policy. This will be subject to separate authorisation processes including that of the NNR as well as other relevant authorities. If there is no capacity to store used fuel either on site or off site, the KNPS licence will prohibit the operation of the plant. The potential licensing of the CISF is an operational matter, does not impact on the safe operation of KNPS and therefore delinked from the safety assessment for the 20-year operational timeframe as per the LTO application. This has been the practice since the initial operation of the facility that required various modifications including (1) re-racking of the spent fuel pools with high-density fuel storage racks, (2) dry storage casks for interim used fuel storage, and (3) re-racking of the spent fuel pools with super-high density fuel storage racks to accommodate the initial 40 year design life of the facility.

7 SUMMARY AND CONCLUSIONS

The third set of public hearings was required due to the submission of additional information affecting the decision on Unit 2. The consultation process however revealed that most of the comments were related to the LTO application in general and not necessarily the about the new information. The NNR however considered all comments, and these inform the conclusion and recommendations.

As in the previous round of hearings, there is grouping of comments (similarity) from the different public and community sectors or areas. This might be partially due to information sessions in the areas and the work and encouragement from NGO’s in the communities to get involved in the public participation process. There are also representations that rely on, or reference reports prepared and shared between organisations and individuals to use during their representations.

An analysis of the representations made by the public found that as during the previous consultation there is a difference of opinion in the public domain:

a) Support for LTO - Support was shown from unions, young professionals or employees from the nuclear sector. They are appreciative of the technology,

understand the technical aspects and see the current and future employment opportunities, commensurate with the perceived risks posed.

b) No support for LTO - The individuals oppose to KNPS continued operation commented from the point that nuclear is dangerous, pose a risk to health and is not managed safely. The arguments presented in support of this narrative might not always be substantiated with correct or applicable information but are pure statements.

It is concluded that all the comments linked to the themes that directly relates to health, safety and environment can all be explained, and justification thereof is provided in the LTO Safety Case and associated support documents provided or addressed in the current licensing bases of both KNPS and Vaalputs. All comments were accepted and considered, this despite the fact that some comments have already been addressed and explained with the Unit 1 decision. Regarding the relevance of the comments to the LTO application and specifically the deferred Unit 2 decision, it is concluded that all the comments linked to the themes that directly relates to health, safety and environment can be explained, and justification thereof is provided in the LTO Safety Case and associated support documents that includes the new or additional information related to TLAA 301.

8 REFERENCES

[1] Submissions and Representations received, refer to Annexure B
[2] Regulations in terms of section 36, read with section 47 of the NNR Act on the Long-Term Operation of Nuclear Installations (R.266).
[3] K-27660-E; Application to operate the Koeberg nuclear power station (KNPS) beyond the timeframe established in the nuclear installation licence No. NIL-01 (Variation 19), including attachments.
[4] 240-165294677; Public Information Document for the Long-Term Operation of Koeberg Nuclear Power Station, Rev 4
[5] 331-618; Safety Case for Long-Term Operation of Koeberg Nuclear Power Station, Rev 3

ANNEXURE A: RECORD OF SUBMISSIONS AND REPRESENTATIONS RECEIVED

Representation No	Date Received	Method	Capacity/Organisation represented	Name
1	28-Jul-25	e-mail	Private	[redacted]
2	28-Aug-25	e-mail	National Treasury	[redacted]
3	1-Sep-25	e-mail	SAYNPS	[redacted]
4	8-Sep-25	e-mail	Private	[redacted]
5	8-Sep-25	e-mail	Private	[redacted]
6	8-Sep-25	e-mail	Private	[redacted]
7	8-Sep-25	e-mail	Private	[redacted]
8	8-Sep-25	e-mail	Private	[redacted]
9	8-Sep-25	e-mail	Private	[redacted]
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11	8-Sep-25	e-mail	Private	[redacted]
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18	8-Sep-25	e-mail	Private	[redacted]
19	8-Sep-25	e-mail	Private	[redacted]
20	15-Sep-25	e-mail	Private	[redacted]
21	16-Sep-25	e-mail	DTIC	[redacted]
22	19-Sep-25	Whatsapp	Private	[redacted]
23	27-Sep-25	e-mail	Private	[redacted]
24	29-Sep-25	Oral presentation	Private	[redacted]
25	29-Sep-25	Oral presentation	Private	[redacted]
26	29-Sep-25	Oral presentation	Private	[redacted]
27	29-Sep-25	Oral presentation	Private	[redacted]
28	29-Sep-25	Oral presentation	Private	[redacted]
29	29-Sep-25	Oral presentation	Private	[redacted]
30	29-Sep-25	Oral presentation	Private	[redacted]
31	29-Sep-25	Oral presentation	Private	[redacted]
32	29-Sep-25	Oral presentation	Private	[redacted]
33	29-Sep-25	Oral presentation	Private	[redacted]
34	29-Sep-25	Oral presentation	Private	[redacted]
35	29-Sep-25	Oral presentation	Private	[redacted]
36	29-Sep-25	Oral presentation	Private	[redacted]
37	29-Sep-25	Oral presentation	Private	[redacted]
38	29-Sep-25	Oral presentation	Private	[redacted]
39	29-Sep-25	Oral presentation	SAYNPS	[redacted]

40	29-Sep-25	Oral presentation	Private	[redacted]
41	29-Sep-25	Oral presentation	Raadslid	[redacted]
42	29-Sep-25	Oral presentation	NRWDI	[redacted]
43	29-Sep-25	Oral presentation	Numsa	[redacted]
44	29-Sep-25	Oral presentation	Solidariteit	[redacted]
45	29-Sep-25	Oral presentation	Num	[redacted]
46	30-Sep-25	Oral presentation	SAYNPS	[redacted]
47	1-Oct-25	e-mail	Private	[redacted]
48	2-Oct-25	Oral presentation	Private	[redacted]
49	2-Oct-25	Oral presentation	SAFCEI	[redacted]
50	2-Oct-25	Oral presentation	Gods Angels reaching out organisation	[redacted]
51	2-Oct-25	Oral presentation	Private	[redacted]
52	2-Oct-25	Oral presentation	Project 90 by 2030	[redacted]
53	3-Oct-25	Oral presentation	Private	[redacted]
54	3-Oct-25	Oral presentation	Councillor	[redacted]
55	3-Oct-25	Oral presentation	Private	[redacted]
56	3-Oct-25	Oral presentation	Private	[redacted]
57	3-Oct-25	Oral presentation	Private	[redacted]
58	3-Oct-25	Oral presentation	Private	[redacted]
59	3-Oct-25	Oral presentation	Private	[redacted]
60	3-Oct-25	Oral presentation	Private	[redacted]
61	3-Oct-25	Oral presentation	Numsa	[redacted]
62	3-Oct-25	Oral presentation	Solidariteit	[redacted]
63	3-Oct-25	Oral presentation	Num	[redacted]
64	4-Oct-25	Oral presentation	Private	[redacted]
65	4-Oct-25	Oral presentation	Ward councillor	[redacted]
66	4-Oct-25	Oral presentation	Koeberg Alert	[redacted]
67	4-Oct-25	Oral presentation	SAFCEI	[redacted]
68	4-Oct-25	Oral presentation	The Green Connection	[redacted]
69	6-Oct-25	e-mail	Atlantic Beach estate	[redacted]
70	7-Oct-25	e-mail	Atlantic Beach estate	[redacted]
71	10-Oct-25	e-mail	Private	[redacted]
72	19-Oct-25	e-mail	Unisa	[redacted]
73	19-Oct-25	e-mail	Platbakkies Farm Retreat	[redacted]
74	19-Oct-25	e-mail	Platbakkies Boerdery	[redacted]
75	19-Oct-25	e-mail	Agri Gamoep	[redacted]
76	19-Oct-25	e-mail	Kamieskroon Farmers Union	[redacted]
77	20-Oct-25	e-mail	Project 90 by 2030	[redacted]
78	20-Oct-25	e-mail	Agri Namaqualand	[redacted]

79	20-Oct-25	By hand	Private	[redacted]
80	20-Oct-25	By hand	Private	[redacted]
81	20-Oct-25	By hand	Private	[redacted]
82	20-Oct-25	By hand	Private	[redacted]
83	20-Oct-25	By hand	Saldanha Bay Community	[redacted]
84	20-Oct-25	By hand	Private	[redacted]
85	20-Oct-25	By hand	Pastor	[redacted]
86	20-Oct-25	By hand	Reverent	[redacted]
87	20-Oct-25	By hand	Private	[redacted]
88	20-Oct-25	By hand	Private	[redacted]
89	20-Oct-25	By hand	Private	[redacted]
90	20-Oct-25	By hand	Private	[redacted]
91	20-Oct-25	By hand	Private	[redacted]
92	20-Oct-25	By hand	Private	[redacted]
93	20-Oct-25	By hand	Private	[redacted]
94	20-Oct-25	By hand	Private	[redacted]
95	20-Oct-25	By hand	Private	[redacted]
96	20-Oct-25	By hand	Private	[redacted]
97	20-Oct-25	By hand	Private	[redacted]
98	20-Oct-25	By hand	Private	[redacted]
99	20-Oct-25	By hand	Private	[redacted]
100	20-Oct-25	By hand	Private	[redacted]
101	20-Oct-25	By hand	Private	[redacted]
102	20-Oct-25	By hand	Private	[redacted]
103	20-Oct-25	By hand	Private	[redacted]
104	20-Oct-25	By hand	Private	[redacted]
105	20-Oct-25	By hand	Private	[redacted]
106	20-Oct-25	By hand	Private	[redacted]
107	20-Oct-25	By hand	Spoegrivier Boerevereniging	[redacted]
108	20-Oct-25	By hand	Spoegrivier Boerevereniging	[redacted]
109	20-Oct-25	By hand	Private	[redacted]
110	20-Oct-25	By hand	Private	[redacted]
111	20-Oct-25	By hand	Private	[redacted]
112	20-Oct-25	By hand	Private	[redacted]
113	20-Oct-25	By hand	Private	[redacted]
114	20-Oct-25	By hand	Private	[redacted]
115	20-Oct-25	By hand	Private	[redacted]
116	20-Oct-25	By hand	Private	[redacted]
117	20-Oct-25	By hand	Private	[redacted]
118	20-Oct-25	By hand	Private	[redacted]
119	20-Oct-25	By hand	Private	[redacted]
120	20-Oct-25	By hand	Private	[redacted]
121	20-Oct-25	By hand	Pastor	[redacted]

122	20-Oct-25	By hand	Private	[redacted]
123	20-Oct-25	By hand	Community member	[redacted]
124	20-Oct-25	By hand	Private	[redacted]
125	20-Oct-25	By hand	Private	[redacted]
126	20-Oct-25	By hand	Private	[redacted]
127	20-Oct-25	By hand	Private	[redacted]
128	20-Oct-25	By hand	Private	[redacted]
129	20-Oct-25	By hand	Private	[redacted]
130	20-Oct-25	By hand	Private	[redacted]
131	20-Oct-25	By hand	Private	[redacted]
132	20-Oct-25	By hand	Private	[redacted]
133	20-Oct-25	By hand	Private	[redacted]
134	20-Oct-25	By hand	Private	[redacted]
135	20-Oct-25	By hand	Private	[redacted]
136	20-Oct-25	By hand	Spoegrivier boerevereniging	[redacted]
137	20-Oct-25	By hand	Private	[redacted]
138	20-Oct-25	By hand	Private	[redacted]
139	20-Oct-25	By hand	Private	[redacted]
140	20-Oct-25	By hand	Private	[redacted]
141	20-Oct-25	By hand	Private	[redacted]
142	20-Oct-25	By hand	Private	[redacted]
143	20-Oct-25	By hand	Private	[redacted]
144	20-Oct-25	By hand	Private	[redacted]
145	20-Oct-25	By hand	Community member	[redacted]
146	20-Oct-25	By hand	Private	[redacted]
147	20-Oct-25	By hand	Kliprand landbouvereniging	[redacted]
148	20-Oct-25	By hand	SAFCEI	[redacted]
149	20-Oct-25	e-mail	Agri Noodrkaap	[redacted]
150	20-Oct-25	e-mail	Kamieskroon Farmers Union	[redacted]

Note – All names redacted

ANNEXURE B: SUMMARY OF THEMES AND APPLICABILITY

Themes	No of comments	Health, Safety & Environment
Vaalputs	229	Y
Emergency planning issues	87	Y
Public consultation process	74	N
Technical documents and issues	64	Y
Nuclear waste issues	63	Y
Public lack of and access to information	53	N
EIA consideration	37	Y
Not applicable Note 1	36	N
Regulatory framework	36	Y
NNR mandate, transparency and the Board	18	N
Safety of communities	16	Y
Danger to people and environment	15	Y
PSIF	15	N
Alternative energy considerations	13	N
In support of LTO	11	N
KNPS and its design are old, maintenance issues, safety and safety upgrades	8	Y
The risk is too high	8	Y
National Legislation	7	N
Climate change	4	Y
Communities not informed	4	N
Nuclear Security	4	Y
Cost of LTO and decommissioning	3	N
Eskom resource adequacy, mistrust and corruption	3	Y
Loadshedding impact and cost of electricity	3	N
Property and land issues	3	N
Environmental sampling status	2	Y
Independent studies	2	Y
IAEA recommendations	1	Y
Non-Proliferation	1	N
NRWDI role	1	Y
Safety Culture status	1	Y

Note 1 – Statements and comments made unrelated to the application.

ANNEXURE C: THEMES WITH RESPONSES

Themes	Response
Alternative energy considerations	The NNR's mandate is specific to regulating nuclear safety in accordance with the NNR Act. This comment falls outside the mandate of the NNR and should therefore be directed towards the Department of Electricity and Energy.
Climate change	Eskom has a strategy for improving potable water resilience at Koeberg Nuclear Power Station KNPS which includes the following: • Prepare the plant for running out of site water • Reduce site water consumption • Use of boreholes installed in the Koeberg Nature Reserve more than two decades ago • Installation of a water treatment plant • Consideration of sea water desalination. Both, the City of Cape Town (CCT) and the Department of Water and Sanitation own and operate dams in the Western Cape in an integrated manner to provide the users with relevant assurance of supply and in KNPS with increased assurance, as a strategic water user. The potential threat of quantity to supply to KNPS is no longer as imminent as during the 2015-2017 drought. Based on the most recent report by the CCT in their water strategy development plan (gazetted in early 2021), the CCT will increase supply through various options, including groundwater augmentation, wastewater re-use and desalination. Demand management through water restrictions will also be implemented sooner, and the probability of reaching a "Day Zero" scenario is considered negligible. The 3rd Periodic Safety Review that has been submitted in support of the LTO safety case has review the impact of climate change on the safety of the plant. Some commentators, specifically in the areas around Vaalputs questioned the effect of climate change on Vaalputs and communities. This aspect falls outside the mandate of the NNR and the scope of the public hearings held.
Communities not informed	Some of the commentators, specifically in the areas around Vaalputs claimed that they did not know of the public hearings, and some said

	that they did not know anything about Koeberg. The NNR has implemented extensive communications and consultation efforts for the public hearings. These efforts included notices published in print media, online platforms; local community radio broadcasts, local community information sessions and public hearings. These were done in English, Afrikaans, isiXhosa and Setswana.
Cost of LTO and decommissioning	The comments related to the cost of LTO do not directly apply to the scope of these public hearings. In regards decommissioning the NNR requires of Eskom through a condition in the licence to have a decommission fund available. It is for the purpose of ensuring future availability of funds to ensure decommissioning of the units and removal of infrastructure to eventual greenfields status.
Danger to people and environment	The NNR provides regulatory oversight to Koeberg operations considering exposure to the environment, the employees and the public through inspections and review of performance reports against limits prescribed in the NNR regulations. The NNR produces and releases to the public the NNR annual report, which contains performance figures against prescribed limits. Occupational exposure figures in the past 5 years have been well within the limits at an average of 47 % to the limit (for the highest individual dose), 2 % of the average individual dose and any discharges to the environment have been so limited that their releases were less than 1 % of the prescribed limit. The protection of the employees, the environment and the public are well assured, with monitoring and continuous improvement required by the NNR.
EIA consideration	This comment falls outside the mandate of the NNR and should therefore be directed to the Department of Forestry Fisheries and Environment.
Emergency planning issues	Section 5 (f) of the National Nuclear Regulator Act, 1999 (Act No. 47 of 1999), states that "The objects of the Regulator are to ensure that provisions for nuclear emergency planning are in place". The NNR Act further in section 38 directs the holder of a nuclear authorisation (in this case Eskom/Koeberg) to enter into an agreement with the relevant municipalities and provincial authorities to establish an emergency plan within a period determined by the Regulator. Once the emergency plan is established as per the act, the Regulator need to approve it and ensure that it is effective for the protection of persons

	should a nuclear accident occur. When the nuclear accident occurs, the holder of a nuclear authorisation must implement the emergency plan as approved by the Regulator. In addition, the Act describes the Responsibilities of holders of nuclear authorisations. Section 26 (4) of the act states that "The holder of a nuclear installation licence must establish a public safety information forum as prescribed in order to inform the persons living in the municipal area in respect of which an emergency plan has been established in terms of section 38(1) on nuclear safety and radiation safety matters". The public safety information forum (PSIF) must conduct all meetings open to any member of the public at a minimum frequency of one meeting per quarter. The PSIF must communicate the date, time and venue of meetings of the forum within the relevant municipal area not less than 14 days prior to each meeting. At Koeberg Nuclear Power Station, the PSIF are held on a quarterly basis and the discussions are related to nuclear/radiation safety matters, including but not limited to nuclear incidents/accidents. Eskom/Koeberg invites the National Nuclear Regulator, the relevant municipality (Disaster Management Centre), the relevant Province (Disaster Management Centre) and relevant national government departments as appropriate to all meetings to facilitate the sharing of information. In terms of Section 4 of the updated Regulations No. 968 dated 12 September 2008, on the establishment of the PSIF, the Board of the National Nuclear Regulator is responsible for appointing the Chairpersons and Deputy Chairpersons for the respective Public Safety Information Forums and they are appointed from the members of the public. It is the responsibility of the Regulator to ensure the effectiveness of the emergency plan and emergency preparedness and response arrangements. Amongst other things, the Regulator conducts inspections and regulatory emergency exercises as well as monitoring the corrective actions that need to be taken where there were non-compliances that were identified. These inspections and regulatory exercises test amongst others, the availability of resources, availability and operability of emergency equipment, activation, and communication between the response organisations, to ensure that the protective actions for the members of the public are implemented effectively.

	Notwithstanding, the NNR has required as part of the Unit 1 decision in 2024, in accordance with Regulation 4(e) of the LTO regulations, that the applicant must conduct an assessment of the effectiveness of the Koeberg Nuclear Emergency Plan and a review of the existing nuclear disaster management infrastructure in conjunction with the City of Cape Town.
Environmental sampling status	Ground water samples are taken by Eskom once every 6 months. In August 2019, Eskom had performed tritium analysis on the ground water samples and has performed gamma spectrometry analysis of ground water for samples from August 2023. The NNR operates a radionuclide analysis laboratory to independently determine the levels of radioactivity in environmental samples taken from regulated facilities and environment outside those facilities for compliance assurance purposes. The NNR on a quarterly basis collect environmental samples and send them for analysis as part of the NNRs independent environmental monitoring programme. Further than that KNPS is required to submit quarterly and annual Environmental Survey Laboratory Reports for NNR review and acceptability. The KNPS safety analyses report details that, in addition to measurement of radioactivity by a sampling of the effluents before release, devices are provided for continuous measurement of the activity of potentially contaminated releases. In addition, samples are taken in the power station area to monitor the ambient radioactivity: surface water, groundwater, food pre-products, etc.
Eskom resource adequacy, mistrust and corruption	Section 20.6 of the Koeberg Nuclear Installation Licence No. NIL-01 Variation 20 requires that the licensee ensures that 'only suitably qualified and experienced persons perform any duty, which may affect the safety of operations on the site'. In addition, Section 4 (d) of the of the LTO Regulation No. R,266 states the licensee must "demonstrate availability of financial and human resources as well as knowledge management for the period of Long-Term Operation, which knowledge management shall include an integrated, systematic approach to identifying, managing and sharing an organisation's knowledge and enabling groups of people to collectively create new knowledge to help achieve the organisation's object". The monitoring of the resources and competency levels at KNPS are undertaken by the NNR compliance assurance programme. Where shortage of resources and

	skills are experienced from time to time, appropriate recruitment strategies are implemented to address the skills gap, included as appropriate, fixed term contracts, etc. The NNR standards require the implementation of an integrated management system, including requirements to ensure a good safety culture. The NNR performs regular oversight activities to ensure compliance with its safety standards and takes necessary enforcement actions if required.
IAEA recommendations	The comments related to the issues identified by the IAEA in the SALTO Mission, these IAEA findings are regarded as advice to improve LTO preparation rather than nuclear safety issues. The NNR monitors the actions implemented to close out the IAEA findings. The status of and progress of these actions were reported in the Public Information Document. Those issues required to be resolved prior to LTO has been included into the LTO Safety Case available on the Eskom and NNR websites. Both documents were made available prior to the hearings, the information was available to the public and provided the information to satisfy the questions asked and statements made regarding the claims of inadequate information and unknown status of the IAEA findings. The NNR LTO decision is not reliant on the findings or issues reported in the mission report. It is used as independent verification and to inform or validate any regulatory decision that is made based on own evaluation of presented information, as supplied by Eskom in support of the application.
Independent studies	A comment was made regarding the latest studies conducted on the health effects of occupational and environmental exposure to nuclear facilities and why such study cannot be commissioned for the region. The ICRP recommendations are used in South Africa through the regulations that incorporate ICRP's radiation protection principles, particularly the justification of practice, optimization of protection (ALARA principle), and dose limitation. The ICRP recommendations consider the international body of knowledge and research on radiation health effects. The NNR Safety Standards related to health (dose limits and constraints) are therefore informed by the recommendations from the

	ICRP that have been incorporated into the IAEA Safety Standards. As a member of the IAEA, the NNR bases its Safety Standards on the internationally accepted IAEA Standards. As part of the respective nuclear authorisations, operators are required to implement an environmental monitoring programme to monitor compliance authorized discharge quantities. As Regulator, the NNR further implements independent monitoring programme to verify compliance with the respective dose constraints and limitations.
KNPS and its design are old, maintenance, safety and safety upgrade issues	Although the Koeberg design is considered “old” because it is a previous generation deign, it was continuously upgraded over time to implement safety improvements and align itself to the safety levels of a new modern design. Eskom has continuously upgraded the plant over the past 41 years, either from lessons learnt from the French or from other international experiences. The continuous modifications and improvements are evident in the improved risk levels presented in the safety case. In general, the Eskom maintenance, inspection and testing processes follows established codes and standards, including, ASME OM Code, US Code of Federal Regulations 10 CFR 50.55a and ASME Section XI and incorporate international operating experience were applicable, especially for components that play an important role in safety. The NNR, on a sampling basis, implements regular inspections on KNPS maintenance processes. Where maintenance issues exist, in addition to Eskom addressing the respective issues they are required to report these to the NNR. The NNR evaluates the issues on a case-by-case basis to ensure that adequate corrective and preventative measures are developed and implemented in the interest of safety.
Loadshedding impact and cost of electricity	The comments received falls outside the scope of the public hearings held. Notwithstanding, since the integrity of the national grid and the supply of electricity to the Western Cape should be protected and the offsite power to KNPS assured, the NNR monitors the situation as well as how KNPS together with Eskom ensures the security of and operability of the offsite power supply through the management of loadshedding.
National Legislation	Some of the commentators referenced Section 24 of the Constitution as well as the National Environmental Management Act in so far, the

	rights afforded by these. The NNR regulatory process support those rights as stipulated in the Constitution.
NNR mandate, transparency, and the Board	The comments received falls outside the scope of the NNR Public hearings held. The NNR safety standards and regulatory practices are based on international standards primarily that of the IAEA. The NNR governance processes ensures that regulatory decisions are independent, in line with the respective standards and is science based. The composition as well as authority of the Board is prescribed in the NNR Act. In line with best practice the functioning of the board is performed in accordance with the Board Charter and associated terms of reference.
Non-Proliferation	The NNR's mandate is specific to regulating nuclear safety in accordance with the NNR Act. This comment falls outside the mandate of the NNR.
NRWDI role	NRWDI is an institute established by the government to manage radioactive waste. NRWDI has the mandate to ensure the safe management of radioactive waste in accordance with international best practice. This will, among others, ensure that the waste is managed in such a way that current and future generations are not impacted by the potential hazards posed by the radioactive content.
Nuclear Security	The NNR has acted on all items listed under the comments received and on the nuclear security issues related to elements of Cyber security, NNR inspections are conducted during NNR processes.
Nuclear waste issues	Koeberg waste is managed in accordance with international requirements of the IAEA. These require that the waste is contained and isolated from the environment. Nuclear waste is disposed of in accordance with international best practice until radioactive content has decayed to levels that no longer pose a hazard. The safety of radioactive waste from Koeberg is overseen by the NNR. Over the years, the NNR has ensured that Koeberg complies with requirements for the management of radioactive waste. The NNR continues to ensure that the current and future generations are protected from any negative effects of the waste from KNPS. In the past 5 years no issues have been raised relating to compliance to these requirements. The NNR also conducts reviews and

	inspections in this regard. The NNR annual report also contains a section dedicated to Radioactive waste safety and transport safety. The KNPS classified low and intermediate level waste, is transported to and disposed at Vaalputs in full compliance with the Vaalputs Waste Acceptance Criteria. The design and manufacturing of the waste packages, the loading of the waste packages onto the transport vehicle and the transport of the waste packages are tested and qualified to ensure that the public and the environment are not affected in case of accidents.
Property and land issues	The comments received under this theme fall outside the scope of the NNR public hearings held.
PSIF	The public safety information forum (PSIF) must conduct all meetings open to any member of the public at a minimum frequency of one meeting per quarter. The PSIF must communicate the date, time and venue of meetings of the forum within the relevant municipal area not less than 14 days prior to each meeting. At Koeberg Nuclear Power Station, the PSIF are held on a quarterly basis and the discussions are related to nuclear/radiation safety matters, including but not limited to nuclear incidents/accidents. Eskom/Koeberg invites the National Nuclear Regulator, the relevant municipality (Disaster Management Centre), the relevant Province (Disaster Management Centre) and relevant national government departments as appropriate to all meetings to facilitate the sharing of information. In terms of Section 4 of the updated Regulations No. 968 dated 12 September 2008, on the establishment of the PSIF, the Board of the National Nuclear Regulator is responsible for appointing the Chairpersons and Deputy Chairpersons for the respective Public Safety Information Forums and they are appointed from the members of the public.
Public consultation process	Some of the commentators indicated that they did not know of the public hearings, and some said that they did not know anything about Koeberg. The NNR has implemented extensive communications and consultation efforts for the public hearings. These efforts included notices published in print media, online platforms, local community radio broadcasts, local community information sessions and public hearings. These were done in English, Afrikaans, isiXhosa and Setswana.

Lack of and access to information by the public	The NNR has acted on the factors listed under this theme. Extensive information has been provided beyond the Public Information Document and Safety Case to the public on both the NNR and Eskom websites. Additional information was released prior to the second round of hearings that was held by the NNR.
Regulatory Framework	Various statements were made during the hearings related to the inadequacy of the Regulatory Framework based on differences to the French approach and its regulatory requirements. The NNR regulatory framework considers the national legislative environment as well as international standards and practices, primarily the IAEA standards. The LTO regulations that have been promulgated considers both national legislation and international practice that is informed by ten yearly periodic safety reviews as performed in France.
Safety of communities	"Section 5 (f) of the National Nuclear Regulator Act, 1999 (Act No. 47 of 1999), states that "The objects of the Regulator are to ensure that provisions for nuclear emergency planning are in place". The NNR Act further in section 38 directs the holder of a nuclear authorisation (in this case Eskom/Koeberg) to enter into an agreement with the relevant municipalities and provincial authorities to establish an emergency plan within a period determined by the Regulator. Once the emergency plan is established as per the act, the Regulator need to approve it and ensure that it is effective for the protection of persons should a nuclear accident occur. When the nuclear accident occurs, the holder of a nuclear authorisation must implement the emergency plan as approved by the Regulator. In addition, the act describes the Responsibilities of holders of nuclear authorisations. Section 26 (4) of the act states that "The holder of a nuclear installation licence must establish a public safety information forum as prescribed to inform the persons living in the municipal area in respect of which an emergency plan has been established in terms of section 38(1) on nuclear safety and radiation safety matters". The public safety information forum (PSIF) must conduct all meetings open to any member of the public at a minimum frequency of one meeting per quarter. The PSIF must communicate the date, time and venue of meetings of the forum within the relevant municipal area not

	less than 14 days prior to each meeting. At Eskom/Koeberg, the PSIF are held on a quarterly basis and the discussions are related to nuclear/radiation safety matters, including but not limited to nuclear incidents/accidents. Eskom/Koeberg invites the National Nuclear Regulator, the relevant municipality (Disaster Management Centre), the relevant Province (Disaster Management Centre) and relevant national government departments as appropriate to all meetings to facilitate the sharing of information. In terms of Section 4 of the updated Regulations No. 968 dated 12 September 2008, on the establishment of the Public Safety Information Forum, the Board of the National Nuclear Regulator is responsible for appointing the Chairpersons and Deputy Chairpersons for the respective Public Safety Information Forums and they are appointed from the members of the public. It is the responsibility of the Regulator to ensure the effectiveness of the emergency plan and emergency preparedness and response arrangements. Amongst other things, the Regulator conducts inspections and regulatory emergency exercises as well as monitoring the corrective actions that need to be taken where there were non-compliances that were identified. These inspections and regulatory exercises test amongst others, the availability of resources, availability and operability of emergency equipment, activation, and communication between the response organisations, to ensure that the protective actions for the members of the public are implemented effectively.
Technical documents and issues	Eskom submitted a Civil Monitoring Programme to the NNR which ensures, as part of the Civil Ageing Management Programme, that the design and safety functions of civil SSCs are fulfilled over the assumed original operating plant life, including long-term operation (LTO) of the plant. NNR has received the report on the containment structures as well as the rollout plan of the system health reports for the balance of the other Safety Related (SR) structures. Eskom has submitted to the NNR the Time-Limited Ageing Analysis (TLAA) for the containment structures and Eskom concluded that the structural integrity of containment is not challenged. Eskom has submitted for the LTO repair an engineering position on containment structures. and the NNR has reviewed the submission.

	Eskom is also investigating other options to reduce the effect of chloride ingress which is the main cause of defects in the containment structure. Repair works have been implemented on the containment buildings where any defects, including delamination and cracks, were identified. A modification for the improvement/ replacement of the Containment monitoring equipment will be implemented, this includes the installation of additional monitoring devices on the containment structures for the next ten yearly Integrated Leak Rate Tests, over and above the planned monitoring already in place. A monitoring program has been implemented to detect any changes in the condition of the structures. The NNR provides oversight in the form of reviews and physical inspections on works conducted by Eskom. Accurate and up to date information related to all the following technical issues raised are contained within the suite of documents available to the public: • Containment cracks • Containment instrumentation • ICCP modification • ILRT • IAEA SALTO findings
The risk is too high	The NNR authorised the operation of KNPS through the issuing of a Nuclear Installation Licence (latest version NIL-01 Variation 21, dated July 2024). In terms of this licence, Koeberg is required to perform risk assessments to demonstrate compliance with the safety criteria issued by the NNR. KNPS demonstrates compliance with these licensing requirements through probabilistic safety analyses, maintenance and inspection programmes. Tsunami and seismic impact on the site have been evaluated for the Duynefontyn site, and such studies are continuing. There are also various administrative (management system e.g. emergency planning and response measures) and engineering features (civil, electrical, mechanical etc.) that are designed to minimise or mitigate the risk. All of these measures are periodically reviewed and inspected by the NNR and regulatory enforcement action get undertaken where necessary.

	1) KNPS contributes about 4% to South Africa's electricity production. The NNR is specifically empowered in terms of National Nuclear Regulator Act (Act 47 of 1999) to regulate nuclear safety and security aspects of Koeberg Nuclear Power Station and other nuclear facilities and activities in the country. 2) Human activity, and in particular nuclear electricity generation is not free of risk. The NNR safety standards include risk criteria for both the public and workers. KNPS has demonstrated that the radiation doses to personnel and the public does not exceed the dose limits specified by the Regulations on Safety Standards for Regulatory Practices (SSRP), 2006 for normal operational activities. The risk assessment furthermore demonstrates compliance with NNR risk criteria. Safety improvements that have been implemented at KNPS have resulted in improved safety performance over the years.
Vaalputs	Vaalputs safety was studied in the early 1980s and it was determined that the environment and the public would not be affected by the Koeberg classified low and intermediate level waste disposed at the site. LTO will result is more waste, however, this additional Koeberg classified low and intermediate level waste will not exceed the original capacity of Vaalputs. Vaalputs began operating in 1986 and as of 2019 (33 years later), less than 15 % of the capacity was utilized. The additional 20 years of operation is not envisaged to reach the capacity limit. South Africa publishes the *South African National Report on the Compliance to Obligations Under the Joint Convention on Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management* freely available online, more information relating to the capacity performance of the Vaalputs can be found therein. The initial studies conducted from 1979 to 1982, and the continuous safety assessments and regulatory oversight by the NNR indicate that there is no negative impact to the public and the environment from the disposal of the Koeberg classified low and intermediate level waste at Vaalputs. This study also indicates that both current and future generations will not be impacted by the disposal of Koeberg classified low and intermediate level waste at Vaalputs.