



MELTON PARISH COUNCIL

MPC(20)72

TO CONSIDER A RESPONSE TO THE CONSULTATION ON THE APPLICATION BY EDF ENERGY TO VARY ITS RADIOACTIVE SUBSTANCES PERMIT FOR SIZEWELL B

Background and summary

EDF Energy has applied to the Environment Agency to vary its existing radioactive substances permit for Sizewell B.

The Environment Agency sets out details of the application and the background to, and reasons for it, as follows:

“This consultation will enable us to collect stakeholder views on the application made by EDF Energy Nuclear Generation Limited to vary the Environmental Permit for the disposal of radioactive waste from Sizewell B Power Station. It is separate from the application made by another company in the EDF group for Environmental Permits at the proposed Sizewell C Power Station.

Operation of Sizewell B Power Station routinely creates radioactive waste that needs to be disposed of. Discharges of radioactive waste to the environment are regulated by an Environmental Permit which specifies certain limitations and conditions.

Operation of the pressurised water reactor at Sizewell gives rise to the radionuclide carbon-14; most of this waste is discharged in gaseous form to air where the environmental impact is less than if it were disposed of to sea.

EDF has applied to increase the limit for carbon-14 discharges to air from 500 gigabecquerels (GBq) to 600 GBq in any twelve-month period.

When the reactor started operating in 1995, carbon-14 discharges to air were limited to 600 GBq over 12 months. This limit was based on the predicted rate of creation of carbon-14 in the original design of the reactor systems. In 2007 we reduced that limit to 500 GBq over 12 months when we reviewed the Permit. That new limit was based on actual emissions data after ten years of operation.

Longer periods of electricity generation has meant that carbon-14 emissions to air have increased since then. Improvements to the reliability of the radioactive waste system has meant that more carbon-14 is extracted for discharge to air rather than sea. In addition, carbon-14 emissions tend to increase over the course of the station's 18-month fuel cycle. Discharges of carbon-14 are not generally designed to

be abated but may be delayed within the plant and released at a slower or faster rate throughout the fuel cycle.

Taken together, this means that EDF could exceed the current annual limit for emissions of carbon-14 to air.

EDF has therefore applied to increase the limit for carbon-14 emissions to air back to the original value of 600 gigabecquerels a year. The applicant has submitted information to demonstrate that this represents Best Available Techniques and a radiological impact assessment based on the proposed limit. The impact assessment predicts that the change in dose to public resulting from the proposed change to the Permit limit will not exceed 0.01 microsievert per year. This is a dose increase of less than 0.1% compared to that arising from the current permitted limits.

We will determine whether EDF is applying Best Available Techniques in respect of carbon-14 emissions to air and whether the radiological impact of the proposed increase is within prescribed dose limits and constraints.

Why We Are Consulting

We will take consultation responses into consideration as part of our determination of the application for EDF's Environmental Permit variation at Sizewell B. If we decide to grant the application we will explain how we made our decision and how we have addressed the comments that were raised.

We will only vary the permit if we believe that harm to the environment, people and wildlife will be minimised. If the applicant can demonstrate that the varied permit will meet all of the legal requirements, including those for the use of best available techniques, public radiation dose and wildlife radiation dose, then we are legally obliged to grant the application.

Advice about what aspects and issues we can and cannot take account of is provided below.

We can take account of:

- relevant environmental regulatory requirements and technical standards.
- information on local population habits and practices and sensitive sites.
- comments on whether the right process is being used for the activity, for example whether the technology is the right one.
- the potential impact, whether the impact is acceptable and what pollution control measures or abatement may be required.
- information that we have not been made aware of in the application.

We cannot take account of:

- issues beyond those in the relevant environmental regulations.
- anything outside the scope of the Environmental Permitting Regulations.
- whether a site should have a formal designation under Habitats Directive or other conservation legislation.
- whether the activity should be allowed or not as a matter of principle and the Justification of practices involving radiation. For example, we will not consider whether nuclear power generation is an appropriate process or whether alternative methods of generating electricity should be used instead.
- land use issues, or sustainability challenges.
- the impact of traffic travelling to and from the site.

- comments about the Government's energy policy.
- comments about the transport of radioactive waste."

The consultation period started on 19 August and runs to 1 October 2020.

Report

The Council will need to decide whether it wishes to respond to this consultation.

Cllr Banks has commented (24 August):

"EDF's planning application does not appear to contain anything that would lower the risk to the environment, public and wildlife. Quite the opposite. The application is being submitted because EDF says *"it may not be possible to operate the plant as designed under normal operating conditions without exceeding the applicable gaseous carbon-14 Annual Limit"*. I would not be surprised if this was code for saying that EDF would incur extra costs if it had to change its operations to comply with the lower emissions limit - though the application does not mention this possibility."

The Environment Agency says that it will only vary the permit if it believes that harm to the environment, people and wildlife will be minimised. (*See paragraph highlighted above.*)

The Agency appears to be boxed-in by the planning framework, in that it would have to grant the application, even if the risk was increased, as long as the risk remained within the legal requirements.

If Councillors are minded to respond to the consultation then a response along the following lines might be sufficient:

"Melton Parish Council is opposed to any increase in the permitted discharge of Carbon-14 emissions from Sizewell B. The Environment Agency, no doubt, had very good public safety reasons for reducing emissions in 2007 from 600 gigabecquerels to 500 gigabecquerels per 12-month period. The Council is firmly of the view that the Agency should not be diluting this standard in 2020 and beyond."

Recommendation

Full Council is requested to consider this consultation and decide if it wishes to respond, and if so whether to adopt the draft response proposed above.

William Grosvenor

Clerk and Executive officer to the Council

9 September 2020

