

**Generic design assessment  
UK EPR nuclear power plant design by  
AREVA NP SAS and Electricité de France SA**

**Assessment report  
Generic site**



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## Generic design assessment

### UK EPR nuclear power plant design by AREVA NP SAS and Electricité de France SA

#### Assessment report – generic site characteristics

**Protective status** This document contains no sensitive nuclear information or commercially confidential information.

**Process and Information Document<sup>1</sup>** The following sections of Table 1 in our Process and Information document are relevant to this assessment:

**Section 1.3:**

We require the Generic Site Characteristics that the requesting party wishes us to take into account when assessing the environmental impact of the reactor design. If we issue any statement of acceptability after our assessment it would be on the basis of these characteristics. A range of generic sites might be addressed with coastal, estuarine and inland characteristics.

**Radioactive Substances Regulation Environmental Principles<sup>2</sup>** The following principles are relevant to this assessment:  
SEDP1 General RSR Principle for siting new facilities - When evaluating sites for a new facility, account shall be taken of the factors that might affect the protection of people and the environment from radiological hazards and the generation of radioactive waste.

**Report author** Julie Tooley

1. Process and Information Document for Generic Assessment of Candidate Nuclear Power Plant Designs, Environment Agency, Jan 2007.

<http://publications.environment-agency.gov.uk/pdf/GEHO0107BLTN-e-e.pdf>

2. Regulatory Guidance Series, No RSR 1: Radioactive Substances Regulation - Environmental Principles (REPs), 2010.

<http://publications.environment-agency.gov.uk/pdf/GEHO0709BQSB-e-e.pdf>

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## 1 Summary

- 1 In order to demonstrate that discharges and other environmental impacts from the reactor designs would be consistent with UK dose constraints and limits and other UK environmental constraints and limits and hence be amenable to authorisation, we require a typical UK (generic) site to be defined against which the impacts can be assessed.
- 2 We have carried out an assessment of EDF and AREVA's generic site characteristics.
- 3 We consider that the UK EPR generic site characteristics are justified and reasonable for the GDA stage and represent a conservative whilst retaining a sufficient amount of realism. We consider the parameters and their values which define the UK EPR generic site are appropriate for use in the assessment of radiological impact at the GDA stage. We recognise that detailed site specific assessments of the radiological impact from the UK EPR will be required at the site specific stage using data and information which relates to the site at which a UK EPR reactor may be located. This is dealt with in our Assessment Reports on the radiological impacts on members of the public (EAGDAR UK EPR-11, Environment Agency, 2010b) and non human species (EAGDAR UK EPR-12, Environment Agency, 2010c).
- 4 We conclude that EDF and AREVA's generic site parameters and their values which define their generic site are appropriate for use in their assessment of radiological impact at the GDA stage.
- 5 Our findings on the wider environmental impacts and waste management arrangements for the UK EPR reactor may be found in our Consultation Document (Environment Agency, 2010a).

## 2 Introduction

- 6 In order to assess the potential impact of a particular reactor design on the environment we need to know the characteristics of the generic site proposed by EDF and AREVA. We recognise that at the generic design assessment stage the specific location of the nuclear plant is not known and therefore the impact assessment will be a scoping assessment which will be followed by a significantly more detailed site specific assessment once the locations of the plants and associated receptors are better known. However at the generic design assessment stage we need to satisfy ourselves that:
- a) the reactor design is such that any environmental impacts would be acceptable to the UK;
  - b) any particular features of the reactor design which may lead to impacts of a type or magnitude which could constrain the locations at which such a plant could be located are identified; and
  - c) any environmental impacts of new build reactors in the UK are as low as reasonable achievable (ALARA), in line with the policy set out in the Energy White Paper (BERR, 2008).
- 7 In order to demonstrate that discharges and other environmental impacts from the reactor designs would be consistent with UK dose constraints and limits and other UK environmental constraints and limits and hence be amenable to authorisation, we require a typical UK (generic) site to be defined against which the impacts can be assessed.
- 8 The types of parameters that may be included in the site descriptions are:
- a) Physical aspects of the location.
  - b) Distance to nearest occupied buildings and centres of population.

- c) Habits of local population.
  - d) Impacts on non-human biota.
  - e) Local presence of designated or protected sites for example, Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs) or Ramsar sites.
  - f) Physical parameters such as meteorological dispersion parameters, liquid discharge parameter, atmospheric discharge parameters and abstraction parameters.
- 9 EDF and AREVA have derived their UK EPR generic site characteristics assuming the UK EPR will be located at a coastal site. The generic site characteristics have been chosen to provide a good geographic representation and represent typical data for sites where potentially a new UK EPR reactor might be located.
- 10 During the assessment certain matters were identified and dealt with using the Regulatory Observation and Technical Query system.

### 3 Assessment

- 11 This assessment considers the generic site described by EDF and AREVA which has been used in the assessment of the potential impact of a UK EPR on members of the public and non-human species. We have taken into account Statutory guidance to the Environment Agency concerning the regulation of radioactive discharges into the environment (DECC, 2009) which sets out the principal that:
- a) regulatory justification of practices should be carried out by the Government;
  - b) optimisation of protection on the basis that radiological doses and risks to workers and members of the public from a source of exposure should be kept as low as reasonably achievable (the ALARA principle);
  - c) application of limits and conditions to control discharges from justified activities;
  - d) sustainable development;
  - e) the use of Best Available Techniques (BAT);
  - f) the precautionary principle;
  - g) the polluter pays principle;
  - h) the preferred use of 'concentrate and contain' in the management of radioactive waste over 'dilute and disperse' in cases where there would be a definite benefit in reducing environmental pollution, provided that BAT is being applied and worker dose is taken into account.

#### 3.1 Assessment methodology

- 12 The basis of our assessment was to:
- a) consider the submission made by EDF and AREVA in particular the Pre-Construction Environmental Report (PCER) and its supporting documents;
  - b) hold technical meetings with EDF and AREVA to clarify our understanding of the information presented and explain any concerns we had with that information;
  - c) raise Regulatory Observations and Technical Queries where we believed information provided by EDF and AREVA was insufficient;
  - d) assess the 'generic site characteristics' proposed by EDF and AREVA and decide if they are reasonable;
  - e) decide on any potential GDA Issues or other issues to carry forward from GDA.

- 13 EDF and AREVA provided their submission to GDA in August 2007. We carried out our initial assessment and concluded we needed additional information. We raised a Regulatory Issue on EDF and AREVA in February 2008 setting out the further information that we needed.
- 14 EDF and AREVA completely revised their submission during 2008 and provided a Pre-Construction Environmental Report (PCER) with supporting documents.
- 15 We assessed information contained in the Pre-Construction Environmental Report but found that while much improved from the original submission there were some areas where we required further information.
- 16 We raised 31 Technical Queries (TQs) on EDF and AREVA during our assessment. Three were relevant to this report (in part):
  - a) Marine dispersion parameters for dose assessment.
  - b) Dose assessment assumptions – short-term releases.
  - c) Non-human species impact assessment.
- 17 EDF and AREVA responded to the TQs. They reviewed and updated the PCER in March 2010 to include all the relevant information provided by the TQs. This report only uses and refers to the information contained in the updated PCER and its supporting documents.

**3.2 Assessment objectives**

- 18 Key areas of the submission made under the GDA arrangements by EDF and AREVA for the UK EPR design that have been considered are:
  - a) Are the generic site characteristics reasonable and justified?
  - b) Are there any aspects of the generic site that would preclude any location at site specific permitting?

**3.3 EDF and AREVA documentation**

19 The Pre-Construction Environmental Report is divided into chapters and sub-chapters (provided as separate documents) and has supporting documents. We referred to the following documents to produce this report:

| Document reference | Title   | Version number |
|--------------------|---|----------------|
| UKEPR-0003-011     | PCER-Sub-chapter 1.1 - Introduction   | 03             |
| UKEPR-0003-012     | PCER – Sub-chapter 1.2 – General description of the unit                                      | 01             |
| UKEPR-0003-090     | PCER – Chapter 9 – Principles and methods used for environmental approach at the design stage | 02             |
| UKEPR-0003-100     | PCER – Chapter 10 – Site environmental characteristics  | 03             |
| UKEPR-0003-110     | PCER – Chapter 11 – Radiological impact assessment  | 02             |

20 We use short references in this report, for example:

- a) PCER sub-chapter 6.2 section 1.2.1 = PCERsc6.2s1.2.1;
- b) BAT Demonstration section 3.2 = EPRBs3.2.

### 3.4 Assessment findings

- 21 We have assessed the information on the generic site in the submission made by EDF and AREVA for its UK EPR design.
- 22 The information is included in the PCER Chapter 10 - Site environmental characteristics and Chapter 11 - Radiological Impact Assessment.
- 23 During the assessment certain matters were identified and dealt with using the Regulatory Observation and Technical Query system.
- 24 Technical Query TQ-EPR-186 required EDF and AREVA to justify certain marine dispersion parameters they had selected for their generic site and had used in their dose assessment, in particular volumetric flow rate used in individual and collective dose assessments. EDF and AREVA's response was taken into account by our contractor undertaking the validation and verification of EDF and AREVA's dose assessment.(see our dose assessment report IMAS/TR/2010/05, Environment Agency, 2010d).
- 25 Technical Query TQ-EPR-180 required EDF and AREVA to provide information on certain parameters they had selected for their generic site and had used in their short-term dose assessment. EDF and AREVA's response was taken into account by our contractor undertaking the validation and verification of EDF and AREVA's dose assessment.
- 26 Technical Query TQ-EPR-237 required EDF and AREVA to provide further information aspects of their assessment of impact on non-human species. Relating in particular to the generic site characteristics the Technical Query required EDF and AREVA to justify that the impact on the freshwater eco-system need not be considered. EDF and AREVA's response confirmed that a freshwater eco-system need not be considered at the generic stage but would be assessed at the site specific stage if appropriate.
- 27 EDF and AREVA assumed a coastal generic site with no freshwater eco-systems. The generic site characteristics were chosen by EDF and AREVA to provide a good geographic representation and represent typical data for sites where potentially a new EPR reactor might be located.
- 28 EDF and AREVA's UK EPR generic site characteristics include data on:
- a) **Exposed population groups** – for dose assessment purposes EDF and AREVA have considered two exposure groups:
    - i) The locally resident farming family selected to represent exposure pathways associated with atmospheric releases from the UK EPR. The local resident family comprises infants, children and adults who live 500 m from the aerial discharge point. They spend most of their time at home, some of which is spent outdoors. They eat food from local sources and milk from local farms which are 500 m from the aerial discharge point. They eat locally caught fish and shellfish.
    - ii) The fisherman family selected to represent the exposure pathways associated with discharges from the UK EPR to the coastal environment. The fisherman and his family are assumed to spend time on intertidal sediments in the area and consume high levels of locally caught fish and shellfish in addition to smaller amounts of locally produced fruit and vegetables from local sources up to 500 m from the aerial discharge point. This group live far enough from the site not to be exposed to direct radiation from atmospheric releases.

Habits data which includes such things as food consumption rates, breathing rates and occupancy rates for three age groups (1 year old infant, 10 year old child and adult) have been used which are consistent with habits data published in recognised sources such as NRPB-W41 (HPA, 2003). (PCERsc11.1 Tables 9 and 12)

- b) **Non-human species** – It is assumed that European and UK protected species may be present including birds, terrestrial mammals, reptiles and amphibians, marine mammals and fish, invertebrates and flora. EDF and AREVA have assumed that all reference organisms specified in the ERICA integrated approach are present (Brown et al, 2008). The use of reference organisms with defined anatomical and physiological properties and habits to represent typical organisms in the ecosystem is an accepted practice in the assessment of impact on non-human species. (PCERsc10.4 Table 2)
- c) **Meteorology** – Meteorological data has been derived for the generic site which is described as a typical coastal UK location with a uniform windrose and 70% Pasquill category D. Data on atmospheric washout and deposition coefficients have been used which are consistent with data published in recognised sources such as RP72 (EC, 1995). (PCERsc11.1 Table 7)
- d) **Terrestrial environment** – For GDA, EDF and AREVA have specified the terrestrial environment only in terms of the parameters that need to be defined for prospective radiological impact assessment purposes. For the terrestrial environment a key parameter is surface roughness and this has been assumed to be 0.3 m which is typical of an agricultural location. More detailed information on the terrestrial environment will be made available at the site specific stage. (PCERsc11.1 Table 7)
- e) **Coastal environment** – EDF and AREVA have examined data for four short listed sites where a UK EPR might be operated. The local waters have been defined using the most restrictive values for parameters such as depth, coastline length, sediment load, rate and density, bioturbation and diffusion rate for potential sites where the UK EPR might be located. Two sets of marine dispersion parameters have been used for dose assessment modelling purpose. For modelling individual dose, EDF and AREVA have used the following parameters:

|  | Data of each potential site |                       |                       |                       | Retained data for the typical site   |                             |
|--|-----------------------------|-----------------------|-----------------------|-----------------------|--|-----------------------------|
| Regional compartment   | Irish Sea West              | North Sea SW          | Cumbrian Waters       | Bristol Channel       | Most Conservative Regional Compartment   | <b>Cumbrian Waters</b>      |
| Marine module  | Irish Sea                   | North Sea             | Irish Sea             | Bristol Channel       | As the regional compartment selected is Cumbrian waters the marine module is Irish Sea | <b>Irish Sea</b>            |
| Local compartment volume (m <sup>3</sup> )                                   | 2 10 <sup>9</sup>           | 3 10 <sup>8</sup>     | 2 10 <sup>9</sup>     | 5 10 <sup>9</sup>     | Smallest volume  | <b>3 10<sup>8</sup></b>     |
| Local compartment depth (m)  | 20                          | 10                    | 20                    | 20                    | Largest depth  | <b>20</b>                   |
| Local compartment coastline length (m)                                       | 1 10 <sup>4</sup>           | 1 10 <sup>4</sup>     | 2 10 <sup>4</sup>     | 3 10 <sup>4</sup>     | Longest coastline length   | <b>3 10<sup>4</sup></b>     |
| Local compartment volumetric exchange rate (m <sup>3</sup> y <sup>-1</sup> ) | 4 10 <sup>10</sup>          | 1.1 10 <sup>10</sup>  | 8 10 <sup>10</sup>    | 110 <sup>11</sup>     | Lowest volumetric exchange rate  | <b>1.1 10<sup>10</sup></b>  |
| Local compartment suspended sediment load (t m <sup>-3</sup> )               | 1 10 <sup>-5</sup>          | 8 10 <sup>-5</sup>    | 5 10 <sup>-6</sup>    | 2 10 <sup>-4</sup>    | Lowest suspended sediment load   | <b>5 10<sup>-6</sup></b>    |
| Local compartment sediment rate (t m <sup>-2</sup> y <sup>-1</sup> )         | 5 10 <sup>-3</sup>          | 1 10 <sup>-4</sup>    | 1 10 <sup>-2</sup>    | 1 10 <sup>-4</sup>    | Highest sediment rate  | <b>1 10<sup>-2</sup></b>    |
| Local compartment sediment density (t m <sup>-3</sup> )                      | 2.6                         | 2.6                   | 2.6                   | 2.6                   | Typical of all European waters   | <b>2.6</b>                  |
| Local compartment Bioturbation rate (m <sup>2</sup> y <sup>-1</sup> )        | 3.6 10 <sup>-5</sup>        | 3.6 10 <sup>-5</sup>  | 3.6 10 <sup>-5</sup>  | 3.6 10 <sup>-5</sup>  | Typical of all European waters   | <b>3.6 10<sup>-5</sup></b>  |
| Local compartment diffusion rate (m <sup>2</sup> y <sup>-1</sup> )           | 3.15 10 <sup>-2</sup>       | 3.15 10 <sup>-2</sup> | 3.15 10 <sup>-2</sup> | 3.15 10 <sup>-2</sup> | Typical of all European waters   | <b>3.15 10<sup>-2</sup></b> |

Note: The regional compartment and marine module are stated to be Cumbrian Waters and Irish Sea however the generic site is a combination of the worst case values for each parameter from the four sets of data in the table above (source of table: TQ-EPR-186).

For modelling collective dose EDF and AREVA have used the following data:

|  | Data of each potential site |                       |                       |                       | Retained data for the typical site |
|--|-----------------------------|-----------------------|-----------------------|-----------------------|------------------------------------|
| Regional compartment   | Irish Sea West              | North Sea SW          | Cumbrian Waters       | Bristol Channel       | <b>North Sea SW</b>                |
| Marine module  | Irish Sea                   | North Sea             | Irish Sea             | Bristol Channel       | <b>North Sea</b>                   |
| Local compartment volume (m <sup>3</sup> )                                   | 2 10 <sup>9</sup>           | 3 10 <sup>8</sup>     | 2 10 <sup>9</sup>     | 5 10 <sup>9</sup>     | <b>3 10<sup>8</sup></b>            |
| Local compartment depth (m)  | 20                          | 10                    | 20                    | 20                    | <b>10</b>                          |
| Local compartment coastline length (m)                                       | 1 10 <sup>4</sup>           | 1 10 <sup>4</sup>     | 2 10 <sup>4</sup>     | 3 10 <sup>4</sup>     | <b>1 10<sup>4</sup></b>            |
| Local compartment volumetric exchange rate (m <sup>3</sup> y <sup>-1</sup> ) | 4 10 <sup>10</sup>          | 1.1 10 <sup>10</sup>  | 8 10 <sup>10</sup>    | 110 <sup>11</sup>     | <b>1.1 10<sup>10</sup></b>         |
| Local compartment suspended sediment load (t m <sup>-3</sup> )               | 1 10 <sup>-5</sup>          | 8 10 <sup>-5</sup>    | 5 10 <sup>-6</sup>    | 2 10 <sup>-4</sup>    | <b>8 10<sup>-5</sup></b>           |
| Local compartment sediment rate (t m <sup>-2</sup> y <sup>-1</sup> )         | 5 10 <sup>-3</sup>          | 1 10 <sup>-4</sup>    | 1 10 <sup>-2</sup>    | 1 10 <sup>-4</sup>    | <b>1 10<sup>-4</sup></b>           |
| Local compartment sediment density (t m <sup>-3</sup> )                      | 2.6                         | 2.6                   | 2.6                   | 2.6                   | <b>2.6</b>                         |
| Local compartment Bioturbation rate (m <sup>2</sup> y <sup>-1</sup> )        | 3.6 10 <sup>-5</sup>        | 3.6 10 <sup>-5</sup>  | 3.6 10 <sup>-5</sup>  | 3.6 10 <sup>-5</sup>  | <b>3.6 10<sup>-5</sup></b>         |
| Local compartment diffusion rate (m <sup>2</sup> y <sup>-1</sup> )           | 3.15 10 <sup>-2</sup>       | 3.15 10 <sup>-2</sup> | 3.15 10 <sup>-2</sup> | 3.15 10 <sup>-2</sup> | <b>3.15 10<sup>-2</sup></b>        |

- 30 EDF and AREVA have used the UK EPR generic site characteristics in their assessment of the potential radiological impact of the UK EPR on members of the public and non-human species.
- 31 In our independent dose assessment carried out on our behalf by Enviro Consulting Ltd (see our report IMAS/TR/2010/05, Environment Agency, 2010d) Table A.2 of Appendix 2 sets out comments on EDF and AREVA’s approach to dose assessment which includes comments on the values of generic site parameters used by EDF and AREVA.
- 32 We consider that the UK EPR generic site characteristics are justified and reasonable for the GDA stage and represent a conservative yet realistic approach. We consider the parameters and their values which define the UK EPR generic site are appropriate for use in the assessment of radiological impact at the GDA stage. We recognise that detailed site specific assessments of the radiological impact from the UK EPR will be required at the site specific stage using data and information which relates to the site at which a UK EPR reactor may be located.

33

**3.5 Compliance with our requirements**

| P&I Table 1 section or REP   | Compliance comments  |
|--|--|
| <p><b>Section 1.3:</b> We require the Generic Site Characteristics that the requesting party wishes us to take into account when assessing the environmental impact of the reactor design. A range of generic sites might be addressed with coastal, estuarine and inland characteristics.</p> | <p>EDF and AREVA provided characteristics and data for their generic site. The values of the generic site parameters used for individual dose assessment and collective dose assessment differed. EDF and AREVA used parameter values resulting in the highest dose in each case. EDF and AREVA proposed a coastal generic site.</p> |
| <p><b>SEDP1</b> General RSR Principle for siting new facilities - When evaluating sites for a new facility, account shall be taken of the factors that might affect the protection of people and the environment from radiological hazards and the generation of radioactive waste.</p>        | <p>The generic site proposed by EDF and AREVA considered factors that might affect the protection of people and the environment. The information about the generic site used in the dose assessments seemed reasonable.</p>  |

## 4 Public Comments

34 We did not receive any public comments during this assessment relating to the generic site characteristics.

## 5 Conclusion

35 We consider that the UK EPR generic site characteristics are justified and reasonable for the GDA stage and represent a conservative approach whilst retaining a sufficient amount of realism. We consider the parameters and their values which define the UK EPR generic site are appropriate for use in the assessment of radiological impact at the GDA stage. We recognise that detailed site specific assessments of the radiological impact from the UK EPR will be required at the site specific stage using data and information which relates to the site at which a UK EPR reactor may be located. This is dealt with in our Assessment Reports (EAGDAR UK EPR-11 and EPR-12, Environment Agency, 2010b and 2010c) on the radiological impacts on members of the public and non human species.

36 We conclude that EDF and AREVA's generic site parameters and their values which define their generic site are appropriate for use in their assessment of radiological impact at the GDA stage.

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## Abbreviations

|               |   |
|---------------|---|
| ALARA         | As low as reasonably achievable   |
| ALARP         | As low as reasonable practicable  |
| BAT           | Best available techniques   |
| EPRB          | GDA UK EPR – BAT demonstration, document UKEPR-0011-001   |
| EPRB 3.5s1.2  | EPRB form 3.3 section 1.2 (example reference)   |
| ERICA         | Environmental Risk from Ionising Contaminants: Assessment and Management (outcome of a EURATOM funded project)  |
| FSA           | Food Standards Agency   |
| GDA           | Generic design assessment   |
| HPA           | Health Protection Agency  |
| HSE           | Health and Safety Executive   |
| IAEA          | International Atomic Energy Agency  |
| ICRP          | International Commission on Radiological Protection   |
| IWS           | GDA UK EPR – Integrated Waste Strategy Document UKEPR-0010-001 Issue 00   |
| JPO           | Joint Programme Office  |
| NDAWG         | UK National Dose Assessment Working Group   |
| P&ID          | Process and information document  |
| PCER          | Pre-Construction Environmental Report   |
| PCERsc3.3s4.1 | PCER sub-chapter 3.3 section 4.1 (example reference)  |
| PCSR          | Pre-Construction Safety Report  |
| Ramsar        | A site of international conservation importance classified at the 'Convention on Wetlands of International Importance' 1971, ratified by the UK Government in 1976  |
| REPs          | Radioactive substances environmental principles   |
| RI            | Regulatory Issue  |
| RO            | Regulatory Observation  |
| RSA 93        | Radioactive Substances Act 1993   |
| RWMD          | Radioactive Waste Management Directorate (of NDA)   |
| SPA           | Special Protection Areas. An area classified as such under the EC Birds Directive to provide protection to birds, their nests, eggs and habitats; areas that are internationally important sites designated under the EEC Wild Birds Directive. |
| SSSI          | Site of Special Scientific Interest identified / notified by English Nature or the Countryside Council for Wales under the Wildlife and Countryside Act 1981 for its importance to nature conservation  |
| TQ            | Technical Query   |

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