



Nuclear Industry Association

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## **Consultation on the Nuclear Industry Association's Application to Justify the UK Advanced Boiling Water Reactor (UK-ABWR): Nuclear Industry Association response**

The Nuclear Industry Association (NIA) welcomes the opportunity to respond to this consultation.

The NIA made this application for the Justification of the UK ABWR with the support of Horizon Nuclear Power and Hitachi-GE, who are also submitting a response to this consultation.

This is the second Justification application submitted by the NIA seeking the justification of new nuclear power stations in the UK. Following our earlier application in 2008 the AP1000 and EPR designs progressed to the next stage of the Justification assessment, and on 18 October 2010 the Secretary of State published his decisions that these designs were justified. This decision was subsequently endorsed by an overwhelming vote in the House of Commons.

The NIA is the trade association and information and representative body for the civil nuclear industry in the UK. It represents over 270 companies operating in all aspects of the nuclear fuel cycle, including the current and prospective operators of the nuclear power stations, the international designers and vendors of nuclear power stations, and those engaged in decommissioning, waste management and nuclear liabilities management. Members also include nuclear equipment suppliers, engineering and construction firms, nuclear research organisations, and legal, financial and consultancy companies.

### **1. Do you agree with the Government's preliminary view that the class or type of practice set out in the application submitted by the Nuclear Industry Association:**

**(a) Qualifies as a new class or type of practice; and**

**(b) Is a suitable class or type of practice for a decision by the Secretary of State?**

**If not, why not?**

The NIA agrees with the Government's preliminary view that the class or type of practice defined in our application as *"The generation of electricity from nuclear energy using oxide fuel of low enrichment in fissile content in a light water cooled, light water moderated thermal reactor currently known as the UK ABWR designed by Hitachi-GE Nuclear Energy, Ltd."* qualifies as a new class or type

of practice. This is consistent with the decisions made in 2010 relating to the AP1000 and EPR designs.

**2. Does the application contain sufficient information to enable the Justifying Authority to make an assessment of the class or type of practice in the application? If not, what further evidence is needed?**

The NIA believes that its application contains sufficient information to enable the Justifying Authority to make an assessment of whether the benefits of the proposed practice outweigh the potential health detriments.

The arguments set out in our successful 2008 application have been updated to take into account new information and events since the 2010 justification decisions were made. As well as the provision of specific UK ABWR information this includes, inter alia, drawing on the Secretary of State's conclusions relating to those decisions; regulatory developments including electricity market reform; updated cost estimates; and a more detailed discussion of the causes and effects of severe accidents and extreme events including the 2011 accident at Fukushima.

**3. Do you have any comments on the arguments or evidence in the NIA's application? Are there any additional arguments or evidence which the Justifying Authority should consider?**

We believe that the arguments set out in our application are both thorough and robust. The two major benefits identified in our 2008 application – security of supply and carbon reduction – are equally valid for the UK ABWR technology, and we believe the application demonstrates that these outweigh the potential detriments.

The NIA recognises that, as in the case of the earlier justification process, the Secretary of State will wish to draw on the advice and experience of the Justification Co-ordination Committee and others in reaching his decision.

**4. Do you have any other comments on the Secretary of State's preliminary view of the class or type of practice, on the approach of the NIA, or any other options?**

The NIA has no further comments except to note that the content of our application, like the earlier 2008 application, is in line with the recommendations included in the Government's guidance document published in March 2008.

**5. As part of the further consultation on the draft decision document, the Secretary of State proposes to run public engagement events. Do you have any suggestions about the format of such events?**

We agree that the consultation on the draft decision document should include appropriate public consultation, and would be happy to participate in this if that would be helpful.