Nuclear Industry Association

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Consultation on the Secretary of State's Proposed Decision on the Regulatory Justification of the UK Advanced Boiling Water Reactor (UK ABWR)

The Nuclear Industry Association (NIA) welcomes the opportunity to respond to this consultation on the Secretary of State's proposed decision as Justifying Authority on the Regulatory Justification of the UK ABWR.

The NIA is the applicant in this case. Our application was made with the support of Horizon Nuclear Power and Hitachi-GE, who are both also submitting a response to this consultation.

The proposed decision relates to 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 Secretary of State published his decisions on 18 October 2010 that the AP1000 and EPR 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. **Chapter 1 (The Secretary of State's Proposed Decision) sets out the Secretary of State's proposed decision that the class or type of practice is justified by its benefits in relation to the health detriment it may cause. Do you agree or disagree with the Secretary of State's proposed decision? Please state the reasons for your answer. Do you consider that there are any matters relevant to the proposed decision that are not referred to in this Chapter? If so, please state what they are, and explain how and why they are relevant, and state what conclusions you think should be reached in light of these matters.**

   The NIA agrees with the Secretary of State's proposed decision. As we set out in our application the security of supply and low carbon benefits of the UK ABWR are very

significant. By comparison the risks of health detriment are very small, well managed and understood, and far outweighed by the net benefit.

2. **Chapter 4 (Carbon Reduction) sets out the evidence on the potential benefit through carbon reduction arising from the class or type of practice. It also sets out the Secretary of State's current views based on that information. Do you agree or disagree with the views presently held by the Secretary of State on these matters? Please state the reasons for your answer. Do you consider that there are any matters relevant to the potential benefit through carbon reduction that are not referred to in this Chapter? If so, please state what they are, and explain how and why they are relevant, and state what conclusions you think should be reached in light of these matters.**

   The NIA agrees with the Secretary of State's view. Climate change poses a major threat to the World and to the UK, and the UK ABWR's ability to assist with meeting the UK's carbon reduction targets by producing low carbon electricity is therefore a significant benefit.

3. **Chapter 5 (Security of Supply and other Economic Effects) sets out the evidence on the potential benefit through security of supply and other economic factors arising from the class or type of practice. It also sets out the Secretary of State's current views based on that information. Do you agree or disagree with the views presently held by the Secretary of State on these matters? Please state the reasons for your answer. Do you consider that there are any matters relevant to the potential benefit through security of supply and other economic factors that are not referred to in this Chapter? If so, please state what they are, and explain how and why they are relevant, and state what conclusions you think should be reached in light of these matters.**

   The NIA agrees with the Secretary of State's view. Internationally BWRs have a strong reliability and UK ABWR plant will be able to provide large scale electricity generation, helping to achieve the diverse generation mix sought by the Government and increasing the resilience of the UK's electricity system. They will also, because of their low fuel costs relative to overall operating costs, contribute to stable electricity prices.

   We agree the project will provide a net benefit to the UK economy, and that the funding arrangements to meet the full cost of decommissioning and radioactive waste management and disposal will be put in place by the operators of any new nuclear power station.

4. **Chapter 6 (Radiological Health Detriment) sets out the evidence on the potential radiological health detriment arising from the class or type of practice. It also sets out the Secretary of State's current views based on that information. Do you agree or disagree with the views presently held by the Secretary of State on these matters? Please state the reasons for your answer. Do you consider that there are any matters relevant to the potential radiological health detriment that are not referred to in this Chapter? If so, please state what they are, and explain how and why they are relevant, and state what conclusions you think should be reached in light of these matters**

   The NIA agrees with the Secretary of State's view. The ABWR has an excellent safety record internationally and compliance with the regulatory regime will ensure that any UK ABWR will have a very limited health impact on both workers and members of the public, and that the specified dose limits and constraints will be achievable. The radiological health detriment will therefore be very small.

5. **Chapter 7 (Radioactive Waste) sets out the evidence on the potential detriment caused by the radioactive waste arising from the class or type of practice. It also sets out the Secretary of State's current views based on that information. Do you agree or disagree with the views presently held by the Secretary of State on these matters? Please state the reasons for your answer. Do you consider that there are any matters relevant to the potential detriment arising from the management and disposal of radioactive waste that are not referred to in this Chapter? If so, please state what they are, and explain how and why they are relevant, and state what conclusions you think should be reached in light of these matters**

   The NIA agrees with the Secretary of State's view. As we set out in our application the types of waste and spent fuel created by new nuclear stations will be similar to those produced by existing stations, and for which clear policies are in place for both their interim and long term management. These include, inter alia, a legal requirement on potential operators to put funding arrangements in place to meet the full costs of waste and decommissioning.

6. **Chapter 8 (Environmental Detriment) sets out the evidence on the potential environmental detriment arising from the class or type of practice. It also sets out the Secretary of State's current views based on that information. Do you agree or disagree with the views presently held by the Secretary of State on these matters? Please state the reasons for your answer. Do you consider that there are any matters relevant to the potential environmental detriment that are not referred to in this Chapter? If so, please state what they are, and explain how and why they are relevant, and state what conclusions you think should be reached in light of these matters.**

   The NIA agrees with the Secretary of State's view. The wider environmental impacts associated with the development of new nuclear power stations, including the UK ABWR, would not be significantly different to those of other forms of electricity generation. These would be appropriately addressed and mitigated in line with all relevant legal and regulatory requirements, including the Planning Act 2008.

7. **Chapter 9 (Safety, Security and Safeguards) sets out the evidence on the potential impact of the class or type of practice in terms of safety and security. It also sets out the Secretary of State's current views based on that information. Do you agree or disagree with the views presently held by the Secretary of State on these matters? Please state the reasons for your answer. Do you consider that there are any matters relevant to safety and security that are not referred to in this Chapter? If so, please state what they are, and explain how and why they are relevant, and state what conclusions you think should be reached in light of these matters**

   The NIA agrees with the Secretary of State's view. We agree that there is an effective regulatory regime in place to ensure that operators maintain high levels of safety.

8. **Are there any other points which you wish to make?**

   The NIA supports the Secretary of State's proposed decision, and agrees that the benefits of building and operating the UK ABWR in the UK outweigh the detriments.

Nuclear Industry Association

21 October 2014