

## Sizewell A and B Stakeholder Group (SSG)

Minutes of the Sub-Group meeting held at 19.00 on Tuesday 24<sup>th</sup> November 2015

at Leiston Community Centre

### Item 1. WELCOME AND ATTENDANCE

- 1.1 Chair welcomed attendees, advising that the main items for this sub group meeting were to consider the GDF Geological Screening consultation ([www.nda.gov.uk/rwm/national-geological-screening/](http://www.nda.gov.uk/rwm/national-geological-screening/)) and to discuss and update the action tracker. There would also be opportunity to briefly discuss any other business, including new information regarding low level waste, in readiness for the next full SSG meeting to be held on 03.12.15.
- 2.1 Members Present: Cllr Marianne Fellowes (MF) Chair; Cllr David Bailey (DB); Mr Declan Foy (DF); Cllr Terry Hodgson (TH); Cllr Bill Howard (BH); Cllr Russ Rainger (RR); Mr Mike Taylor (MT), Cllr Helen Williams (HW).
- 2.2 In Attendance: Louise Franks (LF), Minutes
- 2.3 Apologies were received from Ms Joan Girling, Trevor Branton

### Item 2. GEOLOGICAL DISPOSAL FACILITY (GDF) GEOLOGICAL SCREENING CONSULTATION

- 2.01 Chair introduced this item explaining that an earlier consultation with communities regarding the process of consultation had identified that communities would like more information about the geology of their area. This geological screening would identify what type of packaging/storage system would be required in order to create a GDF in that area, noting that some geologies are more practical and cost effective to work with. Chair advised that the work of the Committee on Radioactive Waste Management (CoRWM) informed this consultation. Chair drew attention to the template for responses and clarified that this was not a discussion about the advantages and disadvantages of GDF's.
- 2.02 MT referred to a recent publication (see Appendix 1) that estimated the total lifetime packaged volume of Higher Activity Waste (HAW) as 463,000m<sup>3</sup>. MT advised that this figure did not include Sizewell B's spent fuel or waste materials (like Plutonium or Uranium) that may be re-used. The issue with heat generation by HAW was briefly discussed.
- 2.03 Chair advised that the French Government have announced that they want to ensure that all radioactive waste is retrievable. In contrast the UK Government have made no such commitment and there are no plans to enable GDF waste to be retrieved in the future. MT supported this with a document from ANDRA dated October 2015 (see appendix 2) that explains the rationale behind the French Government's decision. DF added that this was why possible future sources of energy, like Plutonium and Uranium, were not included in calculations of UK HAW quantities.
- 2.04 Members discussed the condition of some of the waste currently stored at Sellafield and the need to ensure that those with knowledge about what was being stored were able to contribute to the disposal solution.
- 2.05 Members considered the first question: ***"To what extent do you think our proposed approach to providing national-scale existing information about geology relevant to long-term safety is appropriate?"***

- 2.06 To prompt discussion, Chair said, for example, should an alternative could be that each community could be provided with just regional information. Members considered that an understanding of the national picture would be helpful and that different geologies would not determine GDF location but the methodology for utilising that area for a GDF. MT commented that groundwater considerations were important. Chair advised that some areas had already been excluded as the ground was considered too unstable due to mining operations. Chair summarised that members felt it was important for a national picture to be made available to the wider community. DF concurred, adding that this enabled future generations to understand the rationale behind the final choice of location. Chair questioned how this national picture may influence a community to put themselves forward and it was felt that the cost of appropriate methodology could influence this decision.
- 2.07 Chair questioned why, if any geology could be utilised for a GDF, this exercise was being undertaken before a volunteer community could be identified. DF added that there was existing maps of geology and Chair advised, that having attended the RWM briefing held in Ipswich recently, that existing detailed information covered approx 25% of the country. The cost of carrying out this survey was considered and members agreed that the scale of the cost was an important consideration.
- 2.08 MT commented that undertaking a national survey enabled communities to remain confident that their local area wasn't being highlighted as a possible site, as all areas were being considered. Chair added that the outcomes of the national borehole explorations would enable an improved understanding of the national geology that could be useful for other projects.
- 2.09 BH asked if sites other than coastal sites were being considered, suggesting that the use of some geologies would be cost prohibitive. Chair concurred adding that there should also be consideration of the infrastructure to move waste from existing locations to the GDF. This may mean that more than one location could be appropriate. Chair reminded members that the location of the store itself may extend some distance away from the location of the access site.
- 2.10 Chair drew attention to the second question: ***"To what extent do you think that the proposed national information sources are appropriate and sufficient for this exercise?"***
- 2.11 Members debated what the proposed national information sources were and Chair suggested that information about likely flooding or future ice ages could be useful. Chair suggested that members re-read the consultation document and email the Chair with suggestions.
- 2.12 RR advised his understanding of the question posed was how the information was to be disseminated to communities. Chair summarised this as how communities were to be informed and the format of the information provided. She stressed that enabling young people to be educated was vital, given that the impact of the GDF would extend to future generations, and suggested that including geology on the national curriculum was important.
- 2.13 Members considered the third question: ***To what extent do you agree or disagree with the proposed form of the outputs from geological screening? What additional outputs would you find useful?***
- 2.14 Chair suggested that this was the use of DVD's, maps and other formats of information. MT questioned if any historical information would be provided and members considered whether understanding how the process for GDF selection had been undertaken previously would be useful. Members debated this and suggested that a summary of the process previously undertaken, including why this had not been successful, would be helpful. MT questioned how far back this information should go and whether this should include consideration of clay pits.
- 2.15 Chair questioned how the weighting of different aspects would affect outcome, questioning whether public acceptance would be weighted more than geological suitability.

- 2.16 RR questioned whether there had been a firm commitment to a single GDF. Chair explained that consideration to date had been for a single GDF but that she feels that it would be more palatable if more than one GDF was built. DF suggested that more than one GDF would be cost prohibitive. RR suggested that two GDF's would enable the waste to be moved into the GDF's more rapidly and Chair added that it may also reduce waste transport costs.
- 2.17 MT advised that the costs for decommissioning EDF Energy plants would increase dramatically if a GDF were not available and there was a brief discussion about the future cost liabilities to the public purse.
- 2.18 Members considered question four: ***“Do you have any other views on the matters presented in the draft Guidance?”***
- 2.19 Chair suggested that the community should be given a clear understanding of timelines and the process involved. Also, additional information about the types of waste being considered in terms radionuclide content and levels of activity. RR added that clarity that the location of the access site and the storage site are not necessarily the same needs to be ensured.
- 2.20 MT advised that he would like an understanding of how long the packaging itself would last. He referred to the EDF Energy dry fuel store and explained that it was useful to understand the expected lifetime of casks to gain an indication of the costs associated with repackaging spent fuel once the site itself was no longer in operation. Chair added that information from other countries regarding packaging longevity and, indeed, storage facilities themselves, could be included in the information provided.
- 2.21 Chair referred to a leaflet from December 2010 about GDF that had some clear illustrations of the outline of the proposed facility, types of packaging proposed etc. She questioned why these diagrams and pictures had not been re-used in the current information. Chair advised that a community needed to understand that it was not just the repository itself but the infrastructure to support it, like a hostel for the workers, transport network to enable waste ingress etc. DF recalled a DVD explaining how a repository may function being available. Chair advised that in 2010 it was proposed that there would be five years of preparatory studies undertaken prior to 10years of surface based investigation, with construction commencing in 2030. The site would then be in operation from 2040 until 2130. Chair stressed that it had been estimated that it would take 90years for the GDF to be filled.
- 2.22 Chair expressed concern that current communities did not understand the full impact of agreeing to host the GDF. DF commented that it was difficult to understand how future communities would feel about hosting the store, given that economic changes may lead to a scarcity of work and the GDF would provide a source of job opportunities. Chair commented upon the infrastructure required to build the GDF, never mind operate it in the future adding that sourcing the workforce and the materials from within the UK would help British industry.
- 2.23 Chair asked members to consider the final question ***“Do you agree to your responses to this consultation being published?”*** and members agreed that for the SSG this would be appropriate.
- 2.24 Attendees agreed that any additional comments should be submitted via email to the Chair by the end of this week for inclusion in the collective SSG response.

#### **Actions & Recommendations:**

- i **Chair to collate comments from members to the GDF National Geological Screening Guidance (to be submitted by 28.11.15.) and complete and submit the SSG response on line.**

**Item 3. ACTION TRACKER**

- 3.01 Chair advised that MT and herself had met the Secretariat and updated the Action Tracker which had now been circulated for consideration this evening. Attention was drawn to each outstanding action and any updates agreed as follows:
- 3.02 Ref 1942 re steam venting: Chair reported that she had met with Mr Crawford, Sizewell B Site Director and had been advised that realtime monitoring was too resource intensive and that monthly monitoring reports were submitted to the Environment Agency (EA). Chair added that the EA does not require the site to produce realtime monitoring data. MT questioned whether RIMNET could provide realtime monitoring and heard that RIMNET was constantly monitoring but was not linked to EDF Energy or the EA. HW asked whether there was any other body that could ensure the weather conditions and wind direction were recorded at the time of steam venting. Chair advised that the EA had been asked to consider their regime but they had asserted that realtime monitoring was not necessary.
- 3.03 DF described why steam venting occurred, explaining that this happened prior to the reactor becoming back on line as part of the process for preparing to go critical. Steam is monitored on each of the four legs from which it is released. It would be very difficult to record / advise when the steam venting would happen as this would depend on how long it would take to get the reactor at normal operating temperature and have to account for any delay between being ready and actually going critical. Reassurance was sought that the monitors would create an alarm and shut the valves if any contamination was detected and this was provided by DF. The importance of noting the direction of wind at the time of venting was debated and TH commented that even if this was recorded, mapping the area over which the steam would settle would be impossible, citing the original CO<sub>2</sub> detection regime.
- 3.04 BH asked if steam was vented from the reactors during generation and heard that it was not. DF advised that the steam generators were tested monthly and this testing did occur whilst the site were generating power.
- 3.05 MT asked if DF had any concerns about the workforce living in the area. DF stated that he had no concerns and that there was no risk to the public in the area. He advised that neither the regulator nor the operator felt there was any risk to the public and therefore, they would not undertake additional monitoring.
- 3.06 Chair commented that there is a misunderstanding by the public and that the industry and regulators have a responsibility to understand and answer these concerns. DF advised that all PWR's operate in the same way. DF advised that all steam may contain minute quantities of tritium. Chair questioned whether ingestion of crops that this steam settled on could then cause health issues. DF advised that as the steam was released it would be dissipated, diluting the minute quantities of tritium over a wide area. RR added that it was question of sheer quantity in that hundreds of tonnes of affected crop would need to be ingested daily over a considerable time to ingest detectable levels. Members noted that tritium is naturally occurring. Chair drew attention to recently circulated reports about the impact of low levels of radiation on nuclear workers (see AOB below) that support the theory that the true impact of low doses of radiation could not be extrapolated from the effects that detectable levels of radiation cause.
- 3.07 HW suggested that the public are advised of the levels in comparison with something with which they are more familiar, like X-Rays. DF stated that the releases were several orders of magnitude less than an X-ray and therefore incomparable. He added that the real problem was that the only figure the public would accept for nuclear power station releases was zero and that it will never be absolutely zero.
- 3.08 Chair summarised that the EA are not minded to change the regulations and that there remained a lack of public understanding. BH suggested **recommending closure** of this action.

- 3.09 Ref 2096 re dissolution at Bradwell: Chair advised that this was **recommended for closure** as this enquiry had been answered.
- 3.10 Ref 2108 re Emergency Response: Chair advised that Andy Osman is attending the December meeting. The public information leaflet was circulated to the public in October. Outstanding actions are regarding the HERCA/WENRA guidance and the REPIR review. Chair advised that Theberton & Eastbridge Action Group (TEAG) had been invited to meet with a DECC representative and that a request for an SSG member to also attend and ask questions had been refused. Therese Coffey MP requested that a letter outlining SSG concerns was submitted instead and Chair was preparing this. Chair clarified that the TEAG meeting was regarding the accommodation hostel for Sizewell C.
- 3.11 MT advised that he had asked the ONR again about REPIR and remained confused about the definition of the emergency planning area given that the DEPZ included Leiston. However, SCC have defined an urgent emergency countermeasures area (up to 200m from the site) that was considerably smaller. Members questioned whether the DEPZ had been planned for and this was agreed, with the only difference being the distribution of potassium iodate tablets. Chair reiterated that Andy Osman would be at the December SSG meeting. Chair raised the question of whether the hostel for Sizewell C workers could be located within the urgent measures zone or the DEPZ. **MT agreed to forward his question posed to the ONR to Andy Osman to ensure this was addressed at the full SSG meeting.**
- 3.12 **MT advised that he would share the response from ONR regarding HERCA/WENRA to the secretariat for circulation.**
- 3.13 Ref 2108b and 2131 re PHE: Chair to ask Dr Coffey to request a response to both enquiries from PHE.
- 3.14 Ref 2191 re food standards monitoring: Chair advised that a new FSA report was to be considered at the December SSG meeting and that it was as yet unclear whether an FSA representative would attend or whether written questions could subsequently be submitted.
- 3.15 Ref 2197 re dry fuel store: Chair advised this had been partially completed and that some questions remained around planning permission. Chair advised that an update on progress towards commissioning would be received at the SSG main meeting. **MT advised that ONR had provided a response to his enquiry re cask fuel storage and that he would ensure this was circulated via the secretariat.** Chair commented that the DFS was sited very close to the road.
- 3.16 Ref 2325 re DFS monitoring: Chair advised that as this was spent fuel the EA had no jurisdiction. DF clarified that the DFS would not be emitting any radiation and Chair questioned how any leaks would be detected if no monitoring was undertaken. DF explained the process for ensuring that the packaging was secure and suggested that this question was asked in advance of the main SSG meeting. **Chair agreed to pose this question to the Sizewell B ONR Inspector.**
- 3.17 Ref 2344 re annual SSG report: Chair advised that the secretariat support for the Chair had been severely reduced as a result of the drive to become more cost effective. The new structure would provide some access to administration but on a far smaller scale. Currently provision of a Clerk to minute meetings remains unaffected. DF questioned whether members could contribute more and Chair asked for support at meetings to welcome and register attendees. It was suggested that perhaps the site representatives would be willing to photocopy paperwork and collect SSG mail. Chair expressed concern that the website and emailed communications were kept updated and advised that this would be the key focus of the administrative support.
- 3.18 Ref 2365 re NFL contributionst: ongoing as details of contributions awaited.
- 3.19 Ref 2368a and b re DECC: **Chair to ask Dr Coffey to request responses.**

- 3.20 Ref 2380 and 2385 re outage releases and workers: **Both closed** as information provided at last full SSG meeting.
- 3.21 Ref 2403 re industrial heritage: Long Shop Museum has been in touch with Paul Hetherington re local industrial heritage. Chair expressed concern that memorabilia was lost as individual workers retire.
- 3.22 Ref 2403 re SSG attendance records: ongoing
- 3.23 Ref 2406 re format of meetings: Chair has implemented changes to the order of the agenda and asked for feedback. Members discussed the balance between effectively dealing with the business of the meeting and enabling the public to express concerns. It was agreed to recommend that all concerns were raised in advance to enable technical / expert input to respond with opportunity to raise subsequent questions at the meeting. **Chair agreed to request that questions were raised in advance of the meeting.**
- 3.24 Ref 2531 re emergency planning: **MT attended an emergency planning consultative committee meeting and agreed to provide a short report for the next SSG meeting.** MT advised that the blue light services were concerned that budget cuts may mean that they were unable to attend emergency training exercises. Action remains open.
- 3.25 Ref 2556 re RPV: Chair advised that the dates for the replacement of the RPV head had been incorrectly reported as 'occurring 6 years ago' instead of 'during 2006'. **Chair agreed to ensure that that correct dates were circulated to all members.** MT explained that this provided reassurance that the correct materials were used. **Recommended for closure.**
- 3.26 Ref 22517 re Sellafield: Chair advised that Stakeholder group Chairs were invited to visit Sellafield in Spring 2016. NDA have been asked to bring any film clips to local SSG's and to explain how ONR new regulatory strategy is affecting Sellafield.
- 3.27 Ref 2686 re sewage outlet: remains open
- 3.28 Ref 2770 re promoting Magnox good neighbour and socio-economic funding: Chair advised this was still ongoing. Promotional leaflets to be sent out next year.
- 3.29 Ref 2786 re blue flag status: Mr Fahey to report at next SSG meeting.
- 3.30 Ref 2823 re dry fuel store inventory: Chair advised she had sent a FOI request and is anticipating response with redactions due to national security issues.
- 3.31 Ref 2827 re quality standards: **MT advised he had seen a response and agreed to send this to the Chair for circulation to members.**
- 3.32 Ref 2920 re membership voting decision: Chair advised this was a personal matter between members and had been superseded by the NDA guidance re not voting on membership matters. **Chair recommended closing this item.**
- 3.33 Ref 2878 and all following actions: Chair advised these were actions arising from the last SSG meeting and were currently open. Members debated how the action tracker would be updated in the future. Chair advised that ideally this would be open on line but security issues prevent this becoming a reality and in practice only the secretariat can update this document. Members agreed that the Action Tracker was a very useful document.

#### **Actions & Recommendations:**

- i **Actions and updates to be undertaken as detailed in bold above to enable consideration at full SSG meeting.**

**Item 4. ANY OTHER BUSINESS**

- 4.1 MT submitted his written concern that the Dry Fuel Store compensation scheme has set a precedent for all future legacy compensation from EDF Energy to be paid solely to the Suffolk Coast and Heaths AONB area. Please see appendix 3 for details.
- 4.2 PW has circulated an email from Dr Fairlie raising concerns about two studies, on leukaemias and solid cancers respectively, in nuclear workers (ref: <http://www.thelancet.com/journals/lanhae/article/PIIS2352-3026%2815%2900094-0/fulltext> and <http://www.bmj.com/content/351/bmj.h5359.long>).
- 4.3 A response from site workers has been requested. DF quoted the following section from the lancet paper:  
“The present study provides strong evidence of a positive association between radiation exposure and leukaemia even for low-dose exposure. This finding shows the importance of adherence to the basic principles of radiation protection—to optimise protection to reduce exposures as much as reasonably achievable and—in the case of patient exposure—to justify that the exposure does more good than harm”  
DF commented that at Sizewell B workers are not continually exposed to ionising radiations and that although the maximum recommended dose for a classified person is 20mSv, the maximum at Sizewell B is kept below 5mSv. He added that whilst this article is of interest and may inform how regulatory bodies set their dose limits in the future this is not of significance to Sizewell B workers at this time.
- 4.4 MT questioned how workers are currently monitored and DF explained that monitoring for contamination was undertaken on a daily basis and that all classified workers underwent a full medical biannually. A body count is also undertaken annually to check for internal contamination. The number of classified people has been reduced to exclude those that are administrators. He added that the biggest killer for workers was asbestosis and more recently was from the effects of drugs, alcohol and cigarettes. DF confirmed that random drug and alcohol tests are undertaken at site daily.
- 4.5 TH asked if these articles had been circulated to members. It was agreed to include references to these published articles in these minutes and to ask both sites and the NDA to respond.
- 4.6 MT advised that Leiston Town Council have raised the problem with the under duct crossing Lovers Lane. MT agreed to keep the SSG informed.

**Actions & Recommendations:**

- i SSG members to consider the question posed by MT ( appendix 3)**
- ii Chair to circulate two published articles to site and NDA and ask for a response.**
- iii MT to advise SSG of any developments regarding the Lovers Lane under duct.**

The meeting closed at 9.15pm

**SSG meeting: 9.30 for 10am on Thursday 3<sup>rd</sup> December 2015 at Aldeburgh Community Centre**

## Appendix 1: Estimated Quantities of Radioactive Waste

### An Overview of NDA Higher Activity Waste

November 2015

#### 2.0 Radioactive Waste in the UK

**A summary of key points:**

- The 2013 UK RWI reports radioactive waste stocks and future arisings totalling 4,720,000 m<sup>3</sup> (in terms of final packaged volume).
- About 90% of the volume of radioactive waste is LAW (consists of LLW and VLLW).
- About 10% of the volume of radioactive waste is HAW (consists of HLW, ILW and a small part of LLW).
- HAW total lifetime packaged volume is 463,000 m<sup>3</sup>.
- By country the proportions of HAW are England (85%), Scotland (9%) and Wales (6%).

#### 2.1 Categories of Radioactive Waste

In the UK radioactive wastes are classified in terms of the nature and quantity of radioactivity they contain and the heat they produce.

**High Level Waste (HLW)** - waste in which the temperature may rise significantly as a result of its radioactivity, so this factor has to be taken into account in the design of storage or disposal facilities.

**Intermediate Level Waste (ILW)** - waste exceeding the upper boundaries for LLW that do not generate sufficient heat for this to be taken into account in the design of storage or disposal facilities.

**Low Level Waste (LLW)** - waste having a radioactive content not exceeding 4 Gigabecquerels per tonne of alpha activity, or 12 Gigabecquerels per tonne of beta/gamma activity.

**Very Low Level Waste (VLLW)** - a sub-category of LLW, it comprises waste that can be safely disposed of with municipal, commercial or industrial waste, or can be disposed of to specified landfill sites subject to limits on radioactivity content.

Radioactive wastes can also be categorised as:

**Higher Activity Waste (HAW)** - comprises HLW, ILW and a small fraction of LLW (<13,500 m<sup>3</sup> packaged volume) with a concentration of specific radionuclides that prohibits its disposal at existing and planned future disposal facilities for LLW.

**Lower Activity Waste (LAW)** - comprises LLW and VLLW.

A small proportion of LLW near the ILW threshold would be classed as HAW where the remainder would be suitable for disposal at existing LLW facilities.

Some radioactive materials that are not currently classified as waste would need to be managed as wastes if it was decided at some future time they had no further use. These materials include spent nuclear fuel, uranium and plutonium

Appendix 2 ANDRA Solutions Newsletter October 2015

# Newsletter

N°15 - October 2015

ANDRA Solutions

A UNIQUE ARRAY OF SKILLS AND SERVICES

NEW IN 2015: Dedicated areas for training & recruitment. An Andra Ceremony. CONNECT TO NUCLEAR. JUNE 28-30, 2015

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### Reversibility and retrievability

#### Governance and technical approach

When reversibility was first introduced in a Research Law in 1991, the initial studies mostly focussed on the technical means to retrieve already disposed waste packages. Since then, the concept has gradually evolved to a much broader scope, and has shifted towards governance issues. This change stems from the evidence that taking decisions which commit the society for 120 years, or 4 generations, as is the case in the Deep Geological Disposal Facility project Cigéo, is not reasonable. It now appears necessary to make the decisions progressive. In such a context, it becomes possible to introduce a learning phase in the project schedule, allow future technical progress to enhance the design, and, importantly, enable the next generations to redirect choices already made, or even go back to an earlier step. Of course, those possibilities rest on technical solutions, sustained R&D and continuous improvement of knowledge. It also requires flexibility and progressivity of the program. The governance decision needs to be informed by monitoring and oversight data. Values of transparency, transmission and involvement of the society are at the core of the concept. All of the tools listed above serve the objective of having a geological disposal that remains under the control of the society, where operations are regularly reviewed, the process controlled, and the next steps are decided together. Alternative options may be selected if relevant, corrective actions may be implemented in case of undesired evolution of the disposal facility. Or, if waste ever becomes a resource, it may be retrieved.

The contents of the reversibility will be detailed in a future law. But already, Andra proposes to adopt a progressive and adaptable closure schedule, and recommends periodic appointments (every 10 years) with the stakeholders, to prepare decisions. Andra will also include monitoring of the repository and organize long term memory keeping of data and decisions. Finally, Andra will design equipments, packages and emplacement cells to allow package retrieval.

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### Appendix 3: MT Question re Legacy Compensation:

#### Legacy and compensation.

The SZB Dry store compensation scheme which EDF or successor companies pay to the whole of the Suffolk Coast and Heaths AONB area only for loss of the AONB forms part of the legal agreement and planning consents for the store. Agreed by SCDC as the planning authority. Currently the agreement pays a one off amount of £100,000 and £20,000 pa over the lifetime of the use of the building and loss of the AONB. This may have set a precedent. If this is the case a value of around £200,000 per hectare may have been set for a one off payment with an annual £40,000 per hectare. This would mean that there should be a substantial sum, due to loss of AONB, including during construction, then for operation and until final site clearance for any Sizewell C development. However any future scheme needs to take account that Leiston and surrounding villages not in the AONB do not receive any compensation, but other developments like Gabbard and (part of ?) Galloper may have taken a different approach. SZC will need two dry fuel stores as well. If the DFS case has set a precedent the land take for the construction site of any Sizewell C will have to be known which we assume will be at Stage 2. If however the precedent was set on loss of land and inability to build elsewhere due to nuclear safeguarding, compensation was previously paid to the old UDC as regards Sizewell A. Either way this subject needs very careful consideration and understanding and yet again would need legal opinion. A similar situation has arisen with Galloper compensation part of which is to be administered through the EDF scheme. The section 106? And planning conditions for Galloper are yet to be located.

Members may wish to consider how this matter is best progressed.

Mike Taylor

24<sup>th</sup> November 2015.