

Date: 8 December 2020
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[REDACTED] Nuclear Safety (Emergency Preparedness & Response) & Radiation
Protection Office for Nuclear Regulation

Dear [REDACTED]

SUFFOLK COUNTY COUNCIL LAND USE PLANNING ASSESSMENT –
SIZEWELL C NEW BUILD

References:

- A. SZC-SCC Emergency Preparedness Update dated 24 November 2020.
- B. Vectos Sizewell Evacuation Report – SZC Update dated 8 December 2020

1. On 6 August 2020, the Office for Nuclear Regulation (ONR) sought the view of the County Council on whether it had any adverse comments on the Sizewell C (SZC) DCO application and if the proposed construction and operation of the development could be accommodated within existing REPPIR off-site emergency arrangements for Sizewell B nuclear power station.

2. Suffolk County Council has had infrequent engagement with EDF New Build over the past 2 years in its quest to understand the detail of the proposed development and how this might impact existing Radiation (Emergency Preparedness and Public Information) Regulations (REPPIR) off-site emergency arrangements for Sizewell B. This cooperation has recently increased since the submission of the DCO earlier this year and progress on providing information to allow the County Council to assess impact on existing radiation emergency arrangements has been much improved.

3. The SZC DCO application sets out a very complex construction proposal that is largely set within the Sizewell B Detailed Emergency Planning Zone and hence will have a major impact on existing off-site radiation emergency arrangements made under REPPIR 19. In addition, there is a second major infrastructure project being progressed via DCO by Scottish Power Renewables that has the potential to overlap with any Sizewell C development. The County Council has adopted similar principles for maintaining adequate off-site emergency arrangements when discussing future emergency planning adjustments with both developers; i.e., it expects the developer to provide the resources and appropriate internal emergency arrangements to deliver urgent public protection measures that are set out in REPPIR off-site emergency arrangements for construction staff and contractors. Ongoing dialogue with EDF New Build, Reference A refers, indicates that this

principle has been accepted. However, to safeguard REPPIR duty holders, and to protect wider Civil Contingencies duties within the Local Resilience Forum, the County Council has consistently sought in its comments to the Planning Inspectorate the following DCO conditions on the Sizewell C development for which ONR support is requested:

- No part of the works covered by the DCO shall commence until emergency plans relating to the construction have been agreed and issued. Nuclear emergency plans cover the EDF Energy Sizewell B Operators emergency plan and the Suffolk County Council Off Site Emergency Plan issued under Radiation (Emergency Preparedness and Public Information) Regulations 2019. Wider civil contingency arrangements include Suffolk Resilience Forum emergency plans for identified risks issued under the Civil Contingencies Act 2004 that might affect the Sizewell C main development site and any associated infrastructure.
- The emergency plans shall be carried out as approved in relation to the relevant part of the relevant works, unless otherwise agreed after consultation through the Sizewell Emergency Planning Consultative Committee or Suffolk Resilience Forum as appropriate.

4. In terms of the ability to accommodate the proposed SZC development into existing REPPIR off-site emergency arrangements, the County Council will rely upon the cooperation of EDF New Build to provide appropriate resources and internal emergency arrangements to deliver agreed urgent public protection actions in the event of a Sizewell B radiation emergency. In addition, EDF New Build will also be required to provide construction staff with prior information that will be made available by the County Council.

5. At this stage, conversations between EDF New Build and the County Council have not identified any barriers that would prevent the SZC development being incorporated into existing off-site emergency arrangements. However, this view can only really be confirmed once emergency planning to deliver revised emergency arrangements is completed and, as appropriate, audited by ONR; hence, the importance of the County Council's DCO conditions for emergency arrangements to ensure that the ability to respond to a Sizewell B radiation emergency remains protected at all times. An assessment of the impact of additional people, traffic and adjustments to local road infrastructure indicated by the SZC DCO has been undertaken with respect to evacuation in a less likely but more severe Sizewell B accident scenario, Reference B refers. This updated assessment indicates that this specific public protection measure can still theoretically be delivered in line with the SRF Radiation Emergency Plan.

6. In terms of future action, the County Council intends to await the outcome of the Planning Inspectorate's deliberation of the DCO application before starting detailed work on changing existing off-site emergency arrangements. This is to ensure that any changes reflect approved development activity. The existing Sizewell off site emergency arrangements already incorporate temporary

adjustments for major infrastructure developments such as is being proposed for SZC and as such a template is already available to progress this specific work in a timely manner.



On behalf of Suffolk County Council