



**BANNG UP TO DATE**

**November, 2010**

*An occasional newsletter for supporters of the  
Blackwater Against new Nuclear Group (BANNG)*

---

**IMPORTANT DATE FOR YOUR DIARY!**

*1 December, 2010 at 7 p.m. - BANNG Public Meeting at the MICA Centre West Mersea*

***A New Nuclear Power Station at Bradwell – the Issues**  
An opportunity to discuss Bradwell with Hergen Hays, Head of New  
Nuclear at the Department of Energy and Climate Change (DECC)*

***Do your best to be there to tell the Government what you think***

---

**Editorial**

**by Andy Blowers, Chair of BANNG**

*It's Getting Closer.....or is it?*

This Autumn has seen several significant developments on the nuclear energy front. Firstly, it has been confirmed that Bradwell remains on the list of sites that are considered, in the Government's words, 'potentially suitable for the deployment of new nuclear power stations by the end of 2025'. So, the Coalition Government, having considered the responses to the National Policy Statements on Energy has confirmed the basic strategy. All but two of the sites listed by the previous Government are retained and those two sites, both in Cumbria, always looked non-starters anyway.

Secondly, the Secretary of State for Energy and Climate Change, the erstwhile anti-nuclear Chris Huhne, has decided that the benefits from new nuclear reactors

outweigh the health detriments. On this basis he feels able to justify new nuclear energy and dismiss the many objections (including BANNG's) and to reject calls for a Public Inquiry.

Thirdly, the Secretary of State has paved the way for nuclear companies to invest by offering them a fixed price on decommissioning and waste management costs. This means the Government - i.e. the taxpayer - and not the operator ultimately takes on the financial risks if no solution to the problem of waste is found. Again, BANNG has objected (see item 6).

Fourthly, the Environment Agency (EA) as a regulator of the nuclear industry has been undertaking a Generic Design Assessment (GDA) of the two proposed reactor designs. On the basis of the evidence it has gathered so far the EA has concluded it can issue 'interim statements of design acceptability'. BANNG has challenged this view arguing that the remaining, considerable uncertainties make any approval premature at this stage (see item 7).

Taken together, these recent developments - on siting, justification, financing and design - seem to give a green light for the rapid deployment of new nuclear power stations. And, the effort being made by EDF to start the programme at Hinkley Point in Somerset is a clear signal of confidence from the nuclear industry.

And yet, all is not quite so rosy for nuclear energy. Around the world nuclear programmes are faltering in the face of cost overruns and technical problems. The projects in Finland and in France that are the precursors of the UK programme are running late, over budget and revealing some safety problems which are halting progress. Already there is slippage in the UK and a feeling that only some of the reactors may eventually be developed. The plans are no further forward than they were a year ago and, as industrial and economic confidence declines, the programme begins to look more doubtful.

The prospects for a new nuclear power station at Bradwell are beginning also to cloud over. Under an agreement a new station cannot be developed at Bradwell unless permission is granted for the go-ahead for two reactors at Sizewell. In any case EDF, the prospective developers of Sizewell, will not be allowed to develop Bradwell as well. EDF's land at Bradwell is up for sale but in this situation it does not seem much of a proposition for any other nuclear operator.

In any case, as we know, Bradwell is a particularly problematic site for a new power station. As BANNG has consistently pointed out in its many submissions to government, it is vulnerable to flooding in the long run, there is a limited capacity of cooling water, the impacts on fishing and marine life will be serious and it will be difficult to evacuate nearby communities in the event of a nuclear emergency.

Although Bradwell does not look an imminent prospect at this time, things can swiftly change. We may have made progress in our opposition but the threat remains. We need to continue to press home our arguments and demonstrate the strength of our support. **Make sure you do your bit to stop Bradwell!**



## 1. BANNNG on the Beaches

As the thoughts of summer fade, we can enjoy the memory of a successful demonstration on the beaches at West Mersea. On a sunny August Bank Holiday a group of BANNNGers kitted out in 'radioactive waste containers' marched along the beach. With heads and arms protruding from black and yellow boxes with slogans and led by Andy Blowers in the garb of the Grim Reaper and ringing a bell, they were an awesome sight. This was the third big demonstration held by BANNNG (the others were the protest on the Strood and the flotilla at Bradwell). Afterwards the marchers gathered more signatures for the Petition.

Please let Varrie Blowers know if you'd like to help or join in future events (contact details at end of Newsletter).

## 2. BANNNG Petition nears its target

For over a year now a group of dedicated BANNNG diehards has been collecting signatures for the Petition to the Secretary of State for Energy and Climate Change. The Petition opposes a new nuclear power station at Bradwell and demands that the site is rejected and restored to greenfield status. The bulk of signatures are from the Blackwater communities but we have drawn support from the rest of Essex and from further afield from those who are opposed to a new power station at Bradwell. Our Petition is the only example of an effort to gather opinions face-to-face on the nuclear issue. By far the majority of people approached have been willing to sign the Petition. We are now nearing our target figure (to be revealed soon) and are hoping to present the Petition in person to the Secretary of State himself. **The Petition is still open so make sure you've signed and get others to sign, too.** A Petition form is attached to this Newsletter.

### **3. Let the Public Have Its Say - Public Meeting with DECC on 1 December**

One of our persistent criticisms has been the failure of the Government to engage in effective consultation with the public. During the last round of consultations the Department of Energy and Climate Change (DECC) held poorly advertised and thinly attended exhibitions and public meetings in Maldon, Bradwell and West Mersea. In the present round they are holding **no** local meetings at all. So, to fill the void, BANNG is organizing a public meeting to be held on Wednesday, 1 December in the MICA Centre West Mersea at 7 p.m. DECC has accepted our invitation to send top officials – Hergen Haye, Head of the New Nuclear Department and Helen Dwyer - to discuss the proposals and public concerns about Bradwell. We hope to have a good debate and to ensure that the Government is fully aware of the reasons why Bradwell is not an acceptable site for a new nuclear power station and radioactive waste store. **PLEASE DO YOUR BEST TO ATTEND AND ENCOURAGE AS MANY PEOPLE AS POSSIBLE TO COME ALONG.**

### **4. DECC National Stakeholder Meetings**

DECC has arranged some national stakeholder meetings including one in London on 2 December. If you'd like to go you will need to register using the form on the following link [www.energynpsconsultation.decc.gov.uk/events/registration](http://www.energynpsconsultation.decc.gov.uk/events/registration)

### **5. Consultation Responses - Telling the Government Why Bradwell is Wrong**

Over the past three years BANNG has had a strong record in providing detailed and well-researched responses to a raft of Government consultations. We've commented on the strategic siting assessment for new nuclear energy, on the nomination of sites, on the National Policy Statements on Energy, on Justification (twice) and have provided both written and oral evidence to the House of Commons Energy and Climate Change Committee. To some people, all this may seem a bit of a wasted effort merely enabling the Government to go through the paces of consultation without taking any notice of the criticisms. And, it's true that effectively no notice at all was taken of the objections to Justification or the call for a Public Inquiry made by a myriad of objectors. On the more positive side we can point to the House of Commons Select Committee endorsing our criticisms of the consultation process. And we have made some considerable headway in ensuring that the key issues at Bradwell – storage of spent fuel on a vulnerable site, impact on a shallow estuary, lack of emergency planning procedures – have been identified as major obstacles to the development of a new nuclear station.

We believe it is important to keep up the opposition by responding to consultations however inadequate they may be. At the end of the day we must hope it will be carefully presented evidence and reasoned argument that will prevail. We have recently submitted two more responses to consultations – on Fixed Unit Pricing and on the General Design Assessment. The full texts have already been distributed to BANNG supporters on e-mail and others on our circulation list.

## **6. Fixed Unit Pricing – ‘Unreasonable and Unjustifiable’**

The Government has proposed that new nuclear operators be offered a Fixed Unit Price (FUP) for decommissioning and radioactive waste management. BANNG believes that this is a highly attractive offer to the nuclear industry since ‘it provides a cap on costs and thereby transfers the risks arising from uncertainties to the Government’. This is regarded by BANNG as both unreasonable and unjustifiable. We feel that operators and their successors should continue to pay the full costs of waste management as they arise.

The point is that the costs cannot be known in advance since the location, timing and method of management of wastes in the future are unknown. It is even more difficult to predict at a site such as Bradwell where costs of maintaining, protecting and defending waste stores on a site increasingly liable to flooding cannot be calculated. In BANNG’s view it must be the operator not the public which bears the risk of funding these unknown and unknowable costs. It seems the Government has turned a deaf ear and intends to offer the operators a fixed cost in the hope of inducing them to invest in new nuclear power.

## **7. Generic Design Assessment (GDA )- Technocratic, Premature and Inadequate**

The Environmental Agency in its role as nuclear regulator has given ‘interim statements of design acceptability’ to the two reactor designs being proposed for the UK’s fleet of new nuclear power stations. In effect this gives a green light to the European EPR design and the Westinghouse A1000 both of which have run into some technical difficulties.

In BANNG’s view there simply isn’t sufficient information on a range of issues to justify a go-ahead. By giving the thumbs up now to an interim approval the regulator is encouraging a momentum which makes final approval a foregone conclusion. In sum, there is the danger of pre-emptive decision making leading to the unstoppable development of new reactors before their designs have been fully and properly approved.

The granting of interim approval is especially worrying on the issue of radioactive waste. The Environment Agency can only summon up ‘reasonable confidence’ that the plans for waste management are workable. Surely ‘reasonable confidence’ is not enough. Communities living near Bradwell and other sites need to be fully assured that these highly dangerous wastes can be managed safely for the indefinite future. That is a big ask when it’s pretty likely that the sites may be flooded within 200 years.

Especially worrying for Bradwell is the fact that the GDA is based on an analysis for coastal sites. Bradwell lies on a shallow estuary where the impacts on marine ecology are likely to be more severe than on the coast. Moreover, there are also problems of abstracting large volumes of cooling water in an estuary with limited capacity.

All in all the GDA makes unconvincing reading. Many issues remain to be settled leaving open a whole range of questions about safety and security of the new designs. In its response to the EA, BANNG has made it clear that the process is premature and

inadequate especially in respect to a site like Bradwell. We believe the GDA should not proceed and that Bradwell should be removed from the list of sites.

## **8. Website**

We are hopeful that the new BANNG website will be up and running by the end of this month.

Our very grateful thanks are due to Nolly Urquhart for setting up, running and paying for the previous website over the past two and a half years.

## **9. BANNG Needs Your Continuing Support**

As mentioned above, Nolly took on the expenses of running the old website. Several members of the Core and Community Awareness Groups have also paid for activities out of their own pockets and some supporters have been generous in their donations. But we need more money to help to keep things running. BANNG has done some amazing things, not least among them responding to all the relevant Government consultations. We believe that this is a feat that has not been achieved by any other group or even by affected Councils.

Can you please renew your donations (suggested donation£5) in the near future? There is a form to complete, tear off and return at the end of this Newsletter – after the Petition form.

We would also appreciate any help that you can give. At the moment it would be good if there were more bodies to help us achieve the signatures target for the Petition. Please get in touch if you can help. (See contact details below.)

## **10. Contact Details**

Varrie Blowers, Secretary of BANNG, 8 Shears Court, West Mersea, CO5 8DB  
Tel.: 07932.644482 E-mail: [vvarrieblowers@yahoo.com](mailto:vvarrieblowers@yahoo.com)

Petition Form/



**Support/Renewed Support Form**

I should like to renew my support for the Blackwater Against New Nuclear Group (BANNG) and attach a donation of £ . (Suggested donation £5.)

Name.....\*Email.....

Address.....

.....Tel. No.....

\*Please supply your e-mail address as it makes it easier to keep in touch with Newsletters, etc.

(Please return this form to: Varrie Blowers, Secretary of BANNG, 8 Shears Court, West Mersea, CO5 8DB)