



## Suffolk Resilience Forum

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Dear EDF Energy

### SIZEWELL C STAGE 1 PRE-APPLICATION CONSULTATION - SUFFOLK RESILIENCE FORUM COMMENTS

Thank you for the opportunity to comment on the initial proposals and options for the proposed Sizewell C development as part of EDF Energy's Stage 1 Pre-Application consultation.

These comments are provided by the Suffolk Resilience Forum as a statutory consultee for major infrastructure projects under the Planning Act 2008 and as the statutory process that will be working with the Office for Nuclear Regulation to ensure safety and security at existing licensed nuclear sites at Sizewell.

This SRF response does not include comment by individual emergency services as they are separate statutory consultees on the Stage 1 proposals. It also does not make comment on any particular option unless there is a clear positive or negative implication on planning for major emergencies.

Detailed comments on each area of associated development within the consultation are provided at the Annex. However, the core issues identified by the Suffolk Resilience Forum at this stage can be summarised as follows:

- A public consultation on proposed changes to existing nuclear emergency arrangements at Sizewell will complete in April 2013 and revised emergency arrangements will be in place by June 2013. These are likely to have a significant impact on the area within which nuclear emergency plans are applied around Sizewell. Any accommodation campus for workers for Sizewell C is likely to be captured within the DEPZ and will need to be included in revised emergency plans.
- The proposed increase in population living and working around Sizewell cannot be absorbed within existing emergency arrangements by local responders without additional resources being provided in the response capability areas of warning & informing, radiation monitoring, health protection, evacuation and shelter.
- The proposed increase in road traffic around the Sizewell and Leiston areas could impact adversely on existing major emergency response arrangements, in particular for nuclear accident response, unless appropriate mitigation measures to control traffic or increase road network capacity are put into place.
- The Suffolk Resilience Forum, led by local authority emergency planners, will need to provide information to the Office for Nuclear Regulation as part of the Development Control Order application process and will need to adjust existing nuclear accident response plans following any decision to build. Any additional burden beyond the scope of Radiation (Emergency Preparedness and Public Information) Regulations 2001 will require resourcing by EDF Energy.

Finally we would like to understand more about the planned programme for construction during the pre-Stage 2 period to allow us to better understand when this may influence the prevailing risks and whether/how these might change over time to indicate when contingency planning arrangements might need to be adjusted.

If you require clarification of any comment, please contact Andy Osman, Head of Emergency Planning, or Graham Saward, District Emergency Planning Officer.

We look forward to working with EDF Energy in the future to ensure that nuclear safety and security is assured.

Yours sincerely

Charlie Hall  
Assistant Chief Constable  
for Suffolk Resilience Forum

Annex:

Detailed Suffolk Resilience Forum Comment on Initial Proposals and Options for the Proposed Sizewell C Development

Copy to:

Department for Energy & Climate Change - Deputy Director (Non-Proliferation & Emergency Planning)  
Officer for Nuclear Regulation - Senior Inspector Emergency Preparedness and Response  
Suffolk County Council - Director Public Protection and Director Public Protection  
Suffolk Coastal District Council - Chief Executive  
Suffolk Fire & Rescue Service - Assistant Chief Fire Officer Service Delivery  
East of England Ambulance Service - Head of Resilience & Special Operations  
NHS Suffolk - Chief Nursing Officer (designate)  
Environment Agency - Eastern Area Manager  
Maritime & Coastguard Agency - Coastal Safety Manager SE England  
Health Protection Agency - Head Norfolk, Suffolk and Cambridge Health Protection Unit

DETAILED SUFFOLK RESILIENCE FORUM COMMENT ON INITIAL PROPOSALS AND OPTIONS FOR THE PROPOSED SIZEWELL C DEVELOPMENT

## **1. Statutory and Policy Context**

1.1 The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 identifies the Suffolk Resilience Forum as a statutory consultee for applications for nationally significant infrastructure projects in Suffolk.

1.2 The National Policy Statement for Nuclear Power Generation (EN-6) identifies Emergency Planning as an area that the Office for Nuclear Regulation will advise the Infrastructure Planning Committee on issues of safety and security as part of the DCO assessment process. The Office for Nuclear Regulation will work with local emergency planners in the provision of this advice.

1.3 People linked to the SZC project that live or work outside of the current Sizewell licensed nuclear site within defined emergency planning zones are the responsibility of local responders under Radiation (Emergency Preparedness and Public Information) Regulations 2001 for protection in the event of a radiation emergency.

1.4 The lead responder for maintaining the Sizewell Off Site Emergency plan is Suffolk County Council. However, Sizewell nuclear response arrangements involve many agencies and the Suffolk Resilience Forum (SRF) partnership is the statutory partnership that agrees Sizewell emergency arrangements that are included in the Sizewell Off Site Plan.

1.5 The proposed areas for associated development are also affected by other risks, such as flooding, covered by the Civil Contingencies Act 2004. These risks and the contingency arrangements to protect the public are managed by the SRF partnership.

## **2. Stage 1 Consultation Response**

2.1 The collective response by the SRF on the EDF Energy Stage 1 consultation cover the following areas linked to core statutory responsibilities:

- o Implications of development activity on existing Suffolk emergency preparedness arrangements. These include specific emergency arrangements for current Sizewell A and B Power stations and flood response, as well as generic emergency response activity by the emergency services.
- o Implications of existing Sizewell emergency arrangements on proposed EDF Energy development activity.

2.2 The SRF response highlights areas of impact on existing contingency arrangements and indicates mitigation actions required to meet statutory requirements.

2.4 An assessment of the final proposals and associated mitigation action will be made by the SRF as part of any Stage 2 consultation process. Any outstanding areas of concern on nuclear accident response arrangements will be resolved by the SRF with the Office for Nuclear Regulation.

## **3. Sizewell Emergency Planning Assumptions**

3.1 The SRF is consulting on increasing the Detailed Emergency Planning Zone (DEPZ) to 4kms to align with IAEA guidance and changes to UK regulatory guidance. This response is provided assuming this change is in place at the time any construction work commences.

3.2 The SRF is also consulting on a Precautionary Emergency Planning Zone (PEPZ) of 15km to align with IAEA guidance and changes to UK regulatory guidance on extendibility. This response is provided assuming this change is in place at any time construction work commences.

#### **4. SZC Main Development Site**

4.1 The main development site lies immediately to the north of the existing Sizewell B power station, on land within the ownership of EDF Energy. This site will subsequently be the subject of an application to become a nuclear licensed site under the Nuclear Installations Act (1965).

4.2 The primary concerns regarding the site are the generic risks associated with a major development site and the potential impact upon emergency response to incidents in the surrounding area on the B1122 road in the area of the proposed main site entrance.

#### **5. Campus Accommodation**

5.1 All 3 campus accommodation options are within the proposed revised DEPZ. The SRF will normally oversee the application of immediate countermeasures in the case of any radiation emergency leading to an off site release of radiation.

5.2 Local responders do not have the capacity to absorb the 2,000 to 3,000 people projected by EDF into off site emergency arrangements.

5.3 If EDF energy wishes to use these campus sites, they will have to develop and resource specific arrangements for people living in the temporary accommodation to immediately shelter and take KI tablets when an Off Site Nuclear Emergency is declared or evacuate if directed by the Suffolk SCG.

5.4 EDF Energy will be asked to fit radiation sensors in any campus accommodation to feed into local and national hazard assessment systems in the event of any radiation emergency.

5.5 Materials used in campus construction must also provide similar protection factors (PF) to domestic houses within the DEPZ. If materials used do not offer a similar PF to domestic brick constructions, the immediate countermeasure required by the SRF would be evacuation and not shelter.

5.6 Construction workers housed within the campus should be pre-issued with KI by EDF Energy. Other workers living within the DEPZ will be pre-issued under existing arrangements.

5.7 Evacuation routes will need to be integrated with wider public evacuation planning.

5.8 EDF Energy will be required to provide arrangements to inform workers and staff at the campus of off site emergency arrangements.

5.9 EDF Energy will be required to provide arrangements to warn workers and staff at the campus of an off site emergency to allow them to take immediate action.

5.10 Any EDF arrangements for campus accommodation will be validated by the SRF through live exercise during the site clearance and preparation phase and certainly before the main construction period commences.

#### **6. Wider Accommodation**

6.1 EDF Energy will be required to provide detailed statistics on the residence of temporary workers not accommodated within campus accommodation or already living within 15kms to allow local health authorities to calculate additional stocks of KI to be held. These figures will need to be updated monthly to allow changes to pre-issued KI arrangements.

6.2 It is understood that accommodation in caravans would be considered for temporary workers as part of the overall accommodation arrangements. The SRF would not support an increase in long term caravan parking within the DEPZ without safeguards being provided by EDF to ensure that these people can be immediately evacuated in the case of an off site nuclear emergency without increasing demand on local responders.

## **7. Park and Ride**

7.1 All 3 Northern Park and Ride options are within the proposed new PEPZ. The SRF will be responsible for applying countermeasures in the case of any radiation emergency leading to an off site release of radiation.

7.2 Local responders do not have the capacity to absorb the implications of workers being unable to access park and ride sites in the case of wide area emergencies.

7.3 If EDF energy wishes to use these Park and Ride sites, they will have to develop and resource specific arrangements for people who use them to be transported from any on site shelter posture to beyond 15kms in the case of an Off Site Nuclear Emergency requiring countermeasures beyond the DEPZ. To avoid further impact, EDF Energy would be required to return workers to their home/place of residence.

7.4 EDF Energy will be required to provide specific information to park and ride users and shuttle bus drivers, as identifiable groups transiting the DEPZ, on off site emergency arrangements.

7.5 EDF Energy will be required to develop arrangements that allow any flow of park and ride traffic to the SZC site to be halted on any declaration of Site Incident or Off Site Emergency to prevent further increase in people within the DEPZ.

## **8. On site parking**

8.1 It is considered that the proposed provision of on-site parking for 1000 cars will complicate evacuation planning, for either nuclear accident or flood risk, and will increase the risk of traffic congestion during times of emergency.

8.2 EDF Energy will be required to demonstrate how people who park on site will be protected during any nuclear incident and evacuated if directed by the emergency services. This is against the background of concerns already expressed about increases in traffic and road network capacity.

## **9. HGV**

9.1 EDF Energy will be required to provide specific information to HGV drivers, as an identifiable group transiting the DEPZ, on off site emergency arrangements.

9.2 EDF Energy will be required to develop arrangements that allow any flow of HGV traffic to the site to be halted on any declaration of Site Incident or Off Site Emergency to allow access by emergency vehicles and to prevent further traffic to the site.

## **10. Marine Off Loading Facility (MOLF)**

10.1 EDF Energy will be required to provide specific information to marine traffic using the MOLF, as an identifiable group transiting the DEPZ, on off site emergency arrangements.

10.2 EDF will need to confirm arrangements with the SRF for Issue of KI and adoption of shelter and evacuation if needed for all maritime vessels within DEPZ.

## **11 Transport by rail**

11.1 EDF Energy will be required to provide specific information to rail traffic using a railhead, as an identifiable group transiting the DEPZ, on off site emergency arrangements.

11.2 EDF will need to confirm arrangements with the SRF for Issue of KI and adoption of shelter and evacuation if needed for train crews using a railhead.

## **12. Sizewell B Stn On Site Emergency Plan**

12.1 EDF Energy will be required to adjust the On Site Emergency Plans to accommodate SZC workers within the SZC licensed nuclear site prior to the site clearance stage to show how the company will protect workers on site in the case of any radiation emergency at Sizewell A or B stns.

12.2 Local responders do not have the capacity to accommodate workers on the SZC site within off site arrangements.

### 13. Off Site Emergency Plan

13.1 The SRF will update the Off Site Plan prior to the site clearance stage to show how changes in local populations due to increased SZC workers will be protected to meet REPPPIR requirements. The SRF will require EDF Energy to cooperate and to share information related to construction activity to allow this amendment to be made. The revised emergency arrangements will be validated through exercise. Costs for reviewing and validating changed emergency arrangements will be recovered from EDF Energy under Radiation (Emergency Preparedness and Public Information) Regulations 2001.

### 14. Visitor Centre

14.1 All three visitor centre options are within the existing 2.4km DEPZ. EDF Energy will be required to agree with the SRF how visitors to the Sizewell Visitor Centre will be accommodated into the Off Site Emergency Plan before this facility can open.

### 15. Freight Management Facility

15.1 Option 2 - Orwell Lorry Park East would have a positive legacy on Suffolk's ability to manage the Port of Felixstowe Op STACK arrangements and would provide a further option for a Suffolk Multi-Agency Strategic Holding Area.

15.2 The Red Route Railhead option would have the least impact on road infrastructure and emergency services response. Other options cut across primary access routes and increase the risk of significant disruption at level crossings.

### 16. Flood Risk

16.1 Many of the construction areas are within Flood Zones. EDF Energy should ensure it has arrangements to receive and act upon flood warnings to prevent workers and key infrastructure from being impacted from flooding. This should include the risk of a significant East Coast flood as this is one of the major risks identified within the National Risk Assessment.

## Glossary

A station	Sizewell A power station operated by Magnox
B station	Sizewell B power station operated by EDF Energy
CCA	Civil Contingencies Act (2004)
DEPZ	Detailed Emergency Planning Zone
EDF	Energy De France
IAEA	International Atomic Energy Authority
JLAG	Joint Local Authorities Group
HGV	Heavy Goods Vehicle
KI	Potassium Iodine
MASHA	Multi Agency Strategic Holding Area
MOLF	Marine Off Loading Facility
PEPZ	Precautionary Emergency Planning Zone
PF	Protection Factor
REPPPIR	Radiation (Emergency Preparedness and Public Information Regulations (2001)
SCG	Strategic Coordination Group
SRF	Suffolk Resilience Forum
SZC	Sizewell C power station