



Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety, D-11055 Berlin, Germany

— by e-mail only —
newnuclearNPS@beis.gov.uk

Nuclear Policy Framework Team
Department for Business, Energy & Industrial Strategy
3rd Floor
1 Victoria Street
London
SW1A 2AW

TEL +49 22899 [REDACTED]

FAX +49 22899 [REDACTED]

[REDACTED]@bmub.bund.de

www.bmub.bund.de

Bonn, 8 March 2018

Dear [REDACTED], dear Madam/Sir,

Thank you for your letter of 7 December 2017 informing us about the public consultation on the process for criteria for designating potentially suitable sites in a new National Policy Statement (NPS) for nuclear power projects with over 1 GW of single reactor capacity for the period 2026-2035.

I appreciate you informing us at this early stage and giving us and the German public, respectively, the opportunity to comment.

As you know, the multiple nuclear meltdowns in the NPP Fukushima Daiichi following the earthquake and tsunami caused a shift in Germany's approach to the peaceful use of nuclear energy. The Federal Government and the two chambers of Parliament decided to end the use of nuclear energy for commercial production of electricity as soon as possible. By the end of 2022 the last German NPP will be taken off the grid.

We acknowledge the choice of energy mix remains a sovereign decision of each state. This being stressed, the focus of our response lies in nuclear safety aspects of the documents for consultation with a view to potential transboundary impact of future plans for new NPPs on Germany.



Page 2

The document stressed that the proposed strategic criteria are based on those used in the original strategic siting assessment process in April 2009 and have been updated to be consistent with current law and policy. We believe that it is of utmost importance to verify those criteria of 2009 in the light of the experiences gained through the accident in Fukushima Daiichi NPP.

In reply to the two questions posed under chapter 2 of the document we have the following comment:

Overall, most of the topics mentioned in the International Atomic Energy Agency's (IAEA) Specific Safety Guide 35 "Site Survey and Site Selection for Nuclear Installations" (Vienna 2015) are included in the siting criteria. The only topic which appears to be missing is "volcanism". Since to our knowledge the British Isles exhibited volcanic activity in prehistoric eras, volcanism might nevertheless be a point for consideration as the screening criteria of IAEA's Specific Safety Guide 21 "Volcanic Hazards in Site Evaluation for Nuclear Installations" (Vienna 2012) is to look for volcanic activity in the last 10 million years.

In reply to the question posed under chapter 3 and the process to designate potentially suitable sites in the new NPS for nuclear power projects we appreciate that the Appraisal of Sustainability (AoS) scoping consultation was published alongside the siting criteria and process consultation. Taking the liberty to comment on the draft scope of the AoS we think that the issue of radiological impact which is addressed several times under "radioactivity levels in the environment" under the section "health and well-being" could be enlarged to also expressly address in the scoping report transboundary effects here (currently only listed under para. 6.9) which is an important factor



Page 3

for determining siting criteria and process. In addition, we believe it is important to also expressly address in that context cumulative effects (mentioned also under para. 6.9) from several NPPs at one site or between several sites, in particular considering that according to chapter 4 of the consultation document future site nominations are already being assessed.

We believe that it is good that the issue of “nuclear waste” is prominently featured in the considerations in the scoping report for the AoS. In this regard we want to thank you for informing us about the consultation on the Draft National Policy Statement for Geological Disposal Infrastructure to which you will receive a separate reply.

In reply to the question posed under chapter 4 we trust that the process ensures that nuclear safety will not suffer from the pressure on operators and regulator to keep the deployment date set by the UK Government and the ambitious schedule mentioned in chapter 4.

As it has been the case in the recent past we appreciate very much you keeping us and the German public informed about these and related matters and thank you in advance for keeping us informed and/or notifying us in the further process, in particular for any future plans and licensing procedures for NPPs in the UK.

To conclude, let me stress that we are very interested in maintaining and possibly fostering our bilateral collaboration on nuclear safety in light of the UK’s decision to leave the EU and Euratom.

Yours sincerely,



Page 4

For the Ministry

[Redacted signature]

[Redacted name]