Dear Mike,

**RE: SUBMISSION TO THE REPORT ON LESSONS TO BE LEARNED FROM THE EVENTS AT THE FUKUSHIMA NUCLEAR POWER STATION**

The Secretary of State wrote to you on 14th March requesting that you provide a report on the implications of the situation in Japan and lessons to be learned for the UK nuclear industry. The exact scope of the report is, of course, for you to decide in your capacity as Chief Nuclear Inspector.

The Government is keen to learn all relevant lessons from the events in Japan, in particular for the UK’s existing nuclear installations and for any nuclear new build. For potential new nuclear power stations we need to ensure that relevant lessons are properly taken into account in any further policy development, whilst avoiding undue delay.

The Energy National Policy Statements set out planning policy for energy infrastructure including new nuclear power stations. The National Policy Statements do not duplicate points which are more properly considered in the regulatory regime. The Nuclear National Policy Statement also reflects an assessment of the sites that are potentially suitable for the deployment of new nuclear power stations. This assessment was a strategic level assessment, again not meant to duplicate regulatory considerations at licensing. Nonetheless, the Government has drawn on the advice of the regulators in developing the National Policy Statements and in the Strategic Siting Assessment of potential new nuclear sites.

The Government is currently reviewing these following the recent public consultation and Parliamentary scrutiny. In the light of the events in Japan the Government has also undertaken to review the National Policy Statements before proceeding with ratification. To ensure that the National Policy Statements continue to reflect the regulator’s current expert advice, we would find it helpful if you could make provision for considering those issues set out at Annex A in your interim report.
We recognise that your report may highlight other areas of relevance. We are also aware that some of the issues listed are also significant for existing nuclear installations but we have not expanded the list to expressly highlight issues relevant to these given the comprehensive nature of the report that you provisionally set out in your statement of 29th March.

In addition, as you have stated it is paramount that the report is comprehensive and based on firm evidence, and we understand that consideration within the interim report will not preclude further consideration of such issues in the final report.

Yours sincerely,

Mark Higson
Chief Executive
Office for Nuclear Development
ANNEX A: Issues relating to National Policy Statements and the interim Weightman Report

1. Revised draft Nuclear National Policy Statement (EN-6)

Alongside EN-1, EN-6 provides the primary basis for decisions taken by the Infrastructure Planning Commission (IPC) on applications it receives for nuclear power stations. It contains planning guidance to the IPC as well as the 8 sites that the Government believes are potentially suitable for the deployment of nuclear power stations by 20251.

2.1 Assessment Principles, impacts and general siting considerations

In the light of your considerations of the events in Japan:

(i) We would welcome your advice on whether there is any significant evidence to suggest that the general assessment principles and guidance on impacts and siting considerations set out in parts 2 & 3 of the revised draft of EN-6 do not remain valid;

(ii) In relation to spent fuel and radioactive waste management, we would welcome your advice on whether there is any significant evidence that leads you to the question the validity of the assertions in EN-6 that, for a new build site, it should be practicable to provide safe and secure interim on-site storage prior to disposal in a geological disposal facility.

2.2 Strategic Suitability of Sites

The revised draft Nuclear National Policy Statement identifies sites that are potentially suitable for the deployment of a new nuclear power station by 2025.

(iii) In the light of your assessment of the events in Japan, do you consider that changes may be needed to the nuclear regulatory regime, its processes or standards that would threaten ONR’s ability to regulate the design, construction, commissioning and start-up of a programme of new nuclear power stations by 2025?

Annex B of the consultation draft of EN-6 lists the sites and the results of the assessment of each site against the Strategic Siting Criteria. Conclusions with regard to those sites’ suitability have drawn on advice provided by the safety, security and environmental regulators. There are generic and site-specific questions which arise in connection with the regulatory advice we have incorporated in our assessment of these sites.

In the light of your consideration of the events in Japan:

(a) Demographics:

(iv) Regulatory advice on the strategic suitability of sites was based on the semi-urban criterion with consideration of populations out to 30km. Is there significant evidence to suggest that the basis for your advice is no longer valid?

(v) The Strategic Siting Assessment, whilst considering demographics, did not consider in detail the extent and capacity for emergency planning. Is your advice that this

---

1 As noted, the Government is currently considering responses to public consultation and Parliamentary scrutiny, and as such the list has not been finalised.
remains an issue which should be considered at the licensing stage rather than at the strategic level?

(b) Seismic risk and capable faulting

(vi) The Strategic Siting Assessments have not considered this due to the assumption of an overall low level of seismic activity in the UK and on the grounds that faulting can only be determined by site-specific detailed investigation. Do you consider that this remains appropriate?

(c) Flood risk, tsunami and storm surge

(vii) The regulatory advice on the strategic suitability of nominated sites in relation to extreme flooding, tsunami and storm surge was based on risk estimates that were considered valid at the time. Do you consider that this strategic level advice remains valid?

(viii) New sites in Flood Zone 3 have been considered potentially suitable from a nuclear safety standpoint. Do you consider that this remains a valid position?

(d) Size of Site and proximity to other hazardous installations

(ix) Is your advice in relation to the minimum size of site or the proximity of adjacent hazardous facilities still valid?

(e) Site-specific Advice

We would be grateful if you could consider the advice you have provided as part of the Strategic Siting Assessment in relation to each of the 8 sites listed in the draft nuclear NPS remains valid, or advise us of any significant changes.

3. Any other relevant factors

We would be grateful if you could advise us of any other factors which you consider we should take into account in finalising the NPS.