

Evaluation of the Environment Agency's Consultation on the Generic Design Assessment (GDA) for new nuclear power stations

Final report: Appendices

Diane Warburton
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Shared Practice
11 Clifton Street, Brighton BN1 3PH
www.sharedpractice.org.uk

Appendices

- 1 Seminar evaluation questionnaire results**
- 2 Stakeholder survey results**
- 3 Stakeholder interview questions**

Appendix 1: Seminar evaluation questionnaire results

Assessing new nuclear reactor designs seminar

Birmingham, 6 July 2010

Response rate: 100 participants; 42 responses = 42% response rate
 Percentages on the figures below calculated as percentage of respondents

1 How far do you agree or disagree with the following statements?

Please tick ONE box in each line	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Comments
This was the right point in the consultation for this seminar	9 (21%)	26 (62%)	5 (12%)	0	1 (2%)	<ul style="list-style-type: none"> • Yes it was timed correctly • Another week to read the consultation documents may have helped • An extra week would have been best • Good to have early in process • Too early for us to have studied the documents
Given the objectives of the seminar there was enough time to discuss the issues properly	2 (5%)	26 (62%)	3 (7%)	10 (24%)	1 (2%)	<ul style="list-style-type: none"> • More time needed for round table discussions and breakouts – DECC presentation not needed • The five minute breaks didn't work out as well as hoped... • Yes there was sufficient time built in for questions • Table discussions most useful – would consider extending these to 10 minutes • Difficult as could always spend longer
There was enough information provided to enable our input	3 (7%)	24 (57%)	11 (26%)	4 (10%)	0	<ul style="list-style-type: none"> • Should have given out consultation documents a little earlier than 1 week • I would have liked more information mailed out prior to event • Had problems downloading information prior to meeting • Details on designs were limited • Would have liked more time to digest the reports • Don't know, I haven't read the documents • Too much unless you are already involved in the applications
Given the objectives all the main issues were covered	7 (17%)	28 (67%)	5 (12%)	0	0	<ul style="list-style-type: none"> • Could only do it superficially • But some superficially • I believe all the main issues were covered

My questions were fully answered	3 (7%)	20 (48%)	9 (21%)	9 (21%)	1 (2%)	<ul style="list-style-type: none"> • Issues are complex and there are disagreements • Plenary process at end overly constrained – some important questions not asked • Where possible my questions were answered • No time for all questions to be answered • The collection process meant questions became distorted • Some of them do not appear to be part of the GDA
I was able to engage with others and share my views	16 (38%)	22 (52%)	4 (10%)	0	0	<ul style="list-style-type: none"> • Opportunity for discussion was provided • Discussion hijacked by 1 or 2 with an agenda which had little to do with GDA
The objectives of the seminar were clear	21 (50%)	18 (43%)	1 (2%)	2 (5%)	0	<ul style="list-style-type: none"> • The original objectives were well expressed • Some time lost at beginning a one sheet objective would have been good
The way the outputs of the seminar will be used was clear	8 (19%)	27 (64%)	5 (12%)	1 (2%)	0	<ul style="list-style-type: none"> • The original objectives were well expressed
The level of influence of the stakeholders on the Environment Agency's plans is clear	2 (5%)	16 (38%)	16 (38%)	8 (19%)	0	<ul style="list-style-type: none"> • Some stakeholders have a more privileged position i.e. professionals? • No – the agency has indicated it will consider points but not how the influence will be exerted thereafter • Talking is one thing • The influence of the stakeholders is still to be determined • Consultation clear but level of influence not really discussed. Proof will come with permits issued • Only two outcomes appear to be approved or approved with conditions some may be unhappy about that
The Environment Agency will listen to and consider stakeholder views	7 (17%)	23 (55%)	12 (29%)	0	0	<ul style="list-style-type: none"> • The influence of the stakeholders is still to be determined • We'll have to wait and see! • But some key points are included in GDA like abstraction from estuaries
The seminar has increased my understanding of the role of the EA in the GDA process	13 (31%)	23 (55%)	4 (10%)	2 (5%)	0	<ul style="list-style-type: none"> • My understanding of GDA was improved • Already fully appraised of EAs involvement
The seminar has increased my understanding of the EA's regulatory process for nuclear new build	10 (24%)	23 (55%)	7 (17%)	2 (5%)	0	<ul style="list-style-type: none"> • I already understood the EA role in this • Already fully appraised of EAs involvement

The seminar has strengthened my confidence in the EA as an independent nuclear regulator	6 (14%)	15 (36%)	20 (48%)	0	1 (2%)	<ul style="list-style-type: none"> Concern that the methodology is synoptic not independent I already understood the EA role in this The process seemed flawed on what was a given and what was up for assessment Already very confident
I understand the next steps in the GDA and site permitting process	7 (17%)	34 (81%)	0	0	0	<ul style="list-style-type: none"> Yes, I already understood this
I understand the future opportunities for engagement in nuclear new build	6 (14%)	22 (52%)	11 (26%)	1 (2%)	1 (2%)	<ul style="list-style-type: none"> Yes I have noted the engagement routes There are no more in GDA. The 'preliminary' consultation is a false idea
The seminar was useful and worthwhile	11 (26%)	29 (69%)	2 (5%)	0	0	<ul style="list-style-type: none"> Up to a point! Yes the seminar was very useful

2 What were the most useful aspects of the seminar?

In summary:

- Information exchange / table discussions / breakout groups: 13
- Understanding of different roles in GDA: 3
- IPC perspective: 3
- Meeting other stakeholders: 2
- Gaining overview / context / background: 2
- Q & A at end: 2
- Time to develop / write down questions between presentations: 2
- Overall explanation of the process: 2
- Information on the designs: 2

Full responses:

- Opportunity to gain some overview and context for the process
- An understanding of everyone's role
- Tablet and questions and presence of the IPC
- Morning presentations
- It has prompted me to participate in the consultation process and indicated the means of doing so
- Information exchange
- After – personal conversations, around the table and informally
- Opportunity for table top discussions post each presentation
- Breakout sessions, questions at end of lectures
- Learning that the GDA process does not involve choice between designs, but ensuring any design must meet basic criteria laid down by the EA and HSE
- Discussion at the tables after each presentation
- Presentation of the different regulators involved in GDA
- The seminar was interactive – good process
- Breakout discussion A, (could get at the detail or have some of the technical points explained and clarified)
- IPC perspective and interaction
- Breakout structure
- Meeting other interested parties
- Break out groups and networking
- Sharing information with stakeholders
- Discussions time
- IPC presentation
- Questions and answers
- Breakout sessions
- Opportunity to write down questions
- Background to the two designs

- I liked the way the discussion was structured with the opportunity to ask questions between presentations
- Information between RP, EA and others
- Table sessions for questions
- Explanation of the general process
- Hearing details of the process
- Hearing about the designs
- The opportunity to hear a diverse range of stakeholder perspectives

3 What were the least useful aspects of the seminar?

In summary:

- Too little time for discussions: 4
- Presentations: 3
- DECC presentation: 3
- Breakout groups: 2

Full responses

- Discussion of radioactive waste management was superficial and complacent. The problem of long term storage on sites in deteriorating physical conditions or periods of social instability simply not grasped. Long term management is riddled with uncertainty
- The DECC/IPC regulations – same old information
- DECC presentation, time is needed for such elaborate presentations, there's no ??
- DECC presentation
- Too fast in managing the workshop elements
- Too little time to formulate questions
- Rather 'rushed' – difficult to take in all the information presented
- The EA has no clear plan for future/wider engagement with the public. This is a concern
- Not enough time for the discussion to allow everyone time to participate
- None
- OND presentation, needed information on timescales – rest was obvious
- Attendees going off track at the breakout session
- Rehearsal of story to date
- Introduction from the facilitators
- Breakouts – hijacked by single policy individuals and not a balanced discussion I'd hoped for
- Too short time to discuss
- Perhaps there were too many presentations but I think it was inevitable
- Presentations by Westinghouse and Arena
- The breakout groups
- The breakout sessions were difficult to get going, and could do with a different structure
- Too generic, some key considerations that may affect designs were missed

4 What was the most important benefit for you personally in taking part in this seminar?

In summary:

- Understanding how to get involved in the next stages of the consultation: 4
- Understanding of the GDA process: 4
- Hearing views of other stakeholders: 4
- General understanding: 3
- Meeting and networking with others in the field: 3
- Data on the designs: 2
- Information exchange: 2

Full responses

- Opportunity to ?? viewpoints
- Understanding the EA/HSA role and timetable
- Planning what I need to do
- Increased understanding of GDA process
- Raising matters
- Increased understanding
- Greater awareness of the consultation process and useful data on the two candidate reactors
- Information exchange
- Understanding the GDA process and its limitations
- Hearing firsthand the questions/viewpoints of other stakeholders
- Presentation of the designs, presentation of the main areas of concerns
- How GDA and EA public consultation is conveyed and perceived by the wider audience

- Meeting and networking with a range of people involved in new build
- Personal experience of issues raised by stakeholder
- To be able to pass on informed views to our MSc student
- To hear feedback first hand
- Sharing information with stakeholders
- Greater understanding and awareness
- Further understanding of process
- Meeting others involved in the process
- Understanding more prior to consultation
- Hearing directly from EA/HSA about the GDA process and objectives
- Understanding other stakeholders views
- Listening
- Making contacts with other interested parties
- Overview of all regulations
- Know how to engage and raise concerns

5 Were the relevant stakeholder interests represented at the seminar? If not, who was missing and/or should not have been there?

In summary:

Right stakeholders: 9

Don't know: 3

Too few / needed more NGOs: 3

Too few / needed more local authorities: 3

Full responses

- Surprisingly, this seemed to be an industry dominated seminar. There were a few NGOs or local groups or local agencies. The local authority representation was thin (NFLA, NaLEAF), and far from prospective sites
- MES
- Academics/research departments
- Yes
- Waste management, emergency response and local authority interests were underrepresented, although EA's responsibilities are predominantly focussed on the regulatory process in England and Wales, two other UK regions are interested too, as are other countries
- Not many local authority councillors present. They may be involved in the planning process at one of its stages, and advising IPC
- Nuclear institute, representatives from west Cumbria
- Appeared to be broad representation
- Yes
- Possibly a shortage of active operators, maybe they wanted to be incognito and learn
- As far as I could see, yes
- Seemed pretty broad
- I was surprised not to see some key NGOs – no doubt they were invited
- Yes
- Don't know
- Unable to comment
- Yes
- Yes
- Greenpeace or FOA?
- Don't know
- Water resources, national fisheries/GEFAS

6 Do you have any other comments?

In summary:

- Good event: 4

Full responses

- Would have tabled the questions in the consultation in breakout groups as suggested in the ?? rather than moving over the whole ?? which happened before in some break out periods
- Breakout workshops could have been better split by issue cluster, (e.g. IWS/SF) rather than vendor. In our breakout (EPR) we skimmed across too many issues
- Need feedback from other breakout sessions to plenary – would like to have heard main points from stakeholder engagement sessions
- Worthwhile event and worth cooperating

- Most presentations were ok, but one or two were far too complex or too 'wordy'. Impact of message tends to get lost if material presented cannot be easily absorbed
- Facilitation, break outs and way in which questions were captured was very good and participation opportunities were excellent
- None at present but I shall be commenting and asking further questions via the website
- Because of other activities the timescale between the documents on EPR and API000 being available at the consultation was, for me, a little too short
- Organisation worked well – it gave opportunity for all to take part and give views – avoiding grandstanding
- Two little time for 'table' discussion
- A good day altogether

7 We would like to contact some of the participants again to do some follow up interviews. If you are willing to be contacted, please complete the following section.

Name

Organisation

Telephone

Email

Thank you

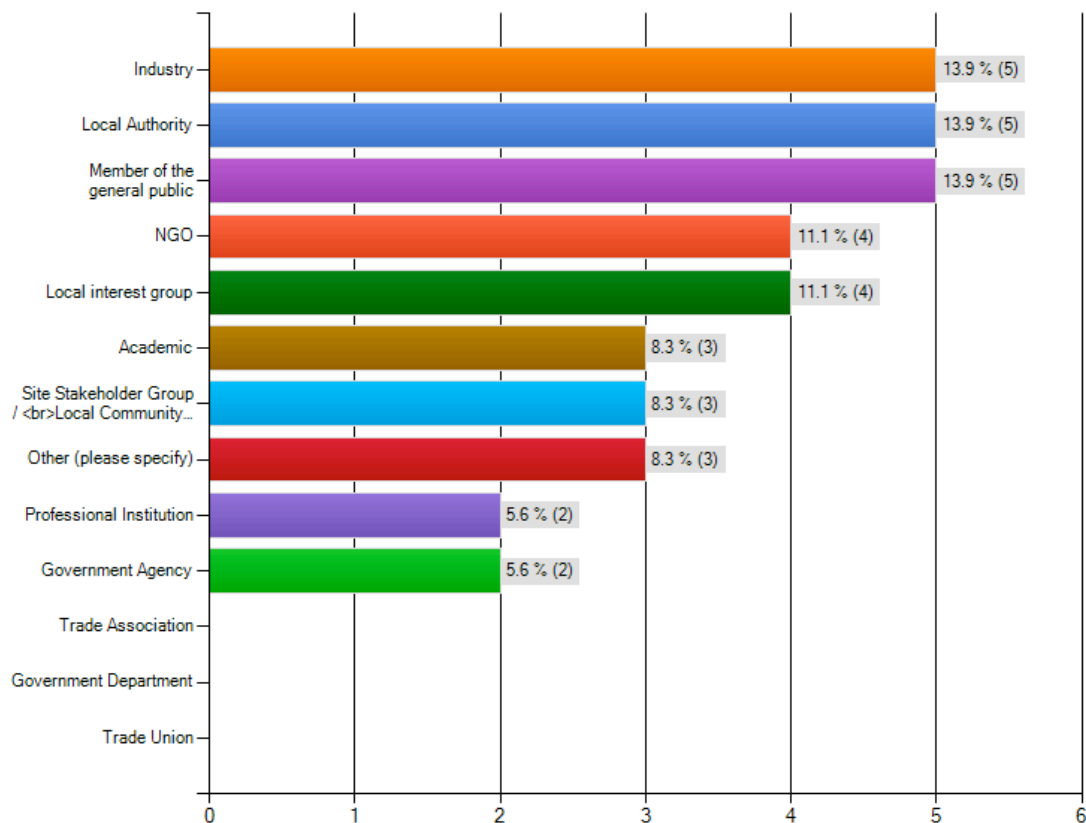
Appendix 2: Stakeholder survey results

Results of an electronic survey carried out in January / February 2011

Response rate: 74 contact addresses were supplied as respondents; 36 responses = response rate of 50%

Note: Percentages shown here are automatically generated, and are based on a percentage of the answers to that question only. Different percentages are calculated for use in the main report, based on percentages of respondents to the survey (i.e. percentages of 36)

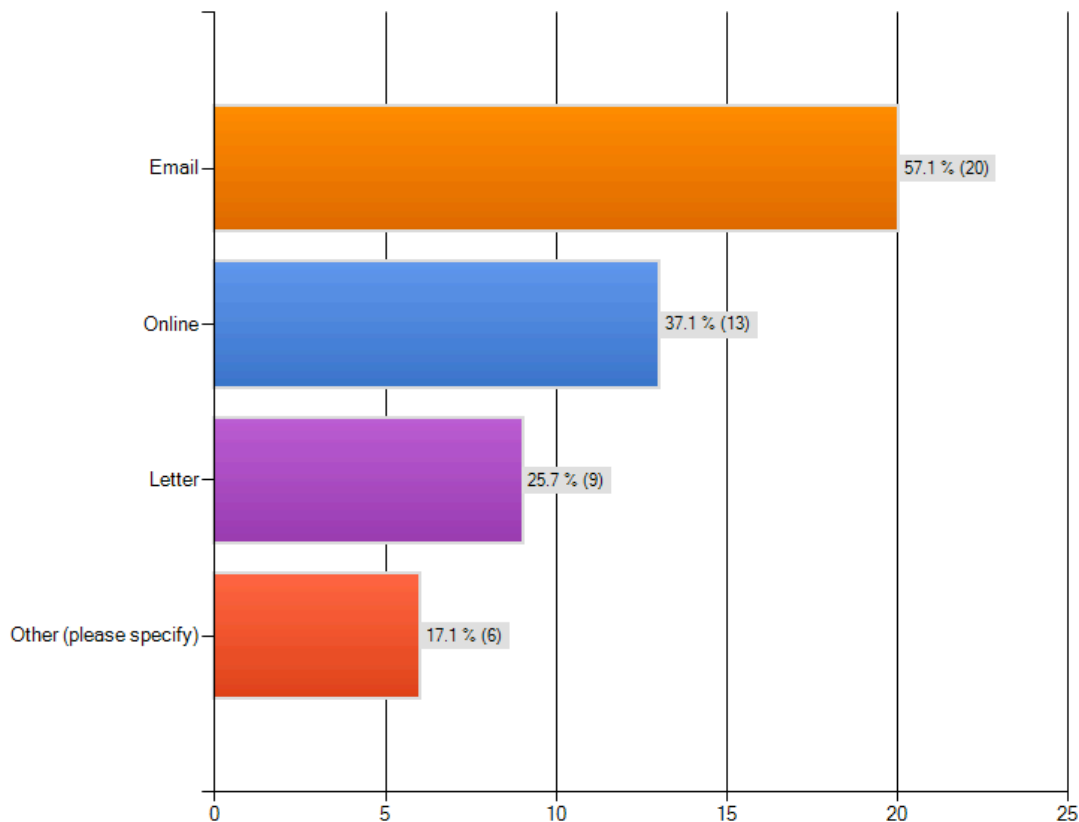
Q1. How would you describe your connection with, or interest in, the GDA consultation?



Other (specified):

Energy analyst authoring articles
National interest group
Parish Council

Q2. Please indicate how you participated in this consultation



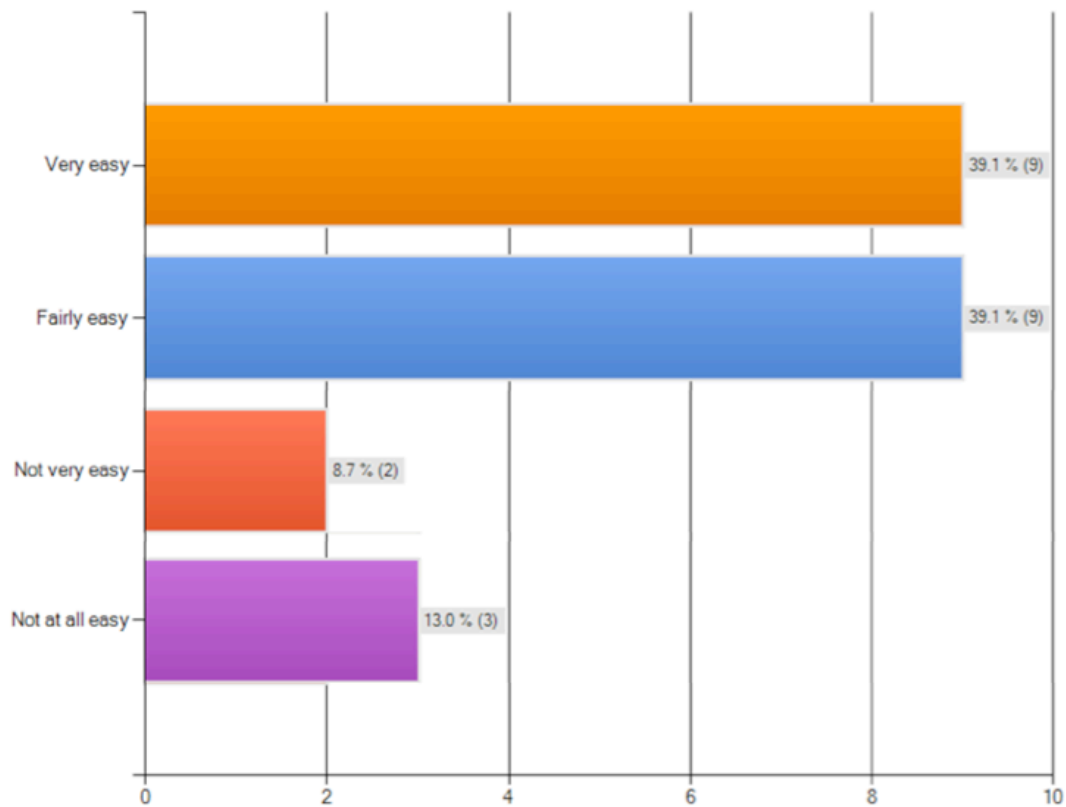
Other (specified):

Sorry but I do not recall taking part in this consultation
Attended Stakeholder Meeting in Birmingham
Roadshow
Participation in workshop (Birmingham)
Attended stakeholder event
Attended gda in Birmingham

Q3. If you did not respond online, please say why not:

1. Adam Dawson of DECC submitted my article EN6 as my participation in the consultation.
2. Frankly, after the meeting in Birmingham I despaired of anyone taking notice of the engineering and scientific input that I wished to make.
3. We did not respond as we felt the GDA assessment would not be taking into account the multiple effect of more than one new reactor on site when in our situation there would be three reactors in total eventually, therefore an accumulative effect on all emissions and environmental issues (ie potable water, sea water, coastal erosion to name a few)
4. Specific comments in limited areas was best handled by a letter
5. We preferred to have a response letter which enabled us to focus our response on those issues of concern to us and the points (and context) we wanted to put forward.
6. It worked better for us to prepare our views in the form of a Word document, which we then sent in by email
7. requested to attend meeting in Bham
8. Because the response was subject to a decision by an Elected Member and needed to be sent with their signature.

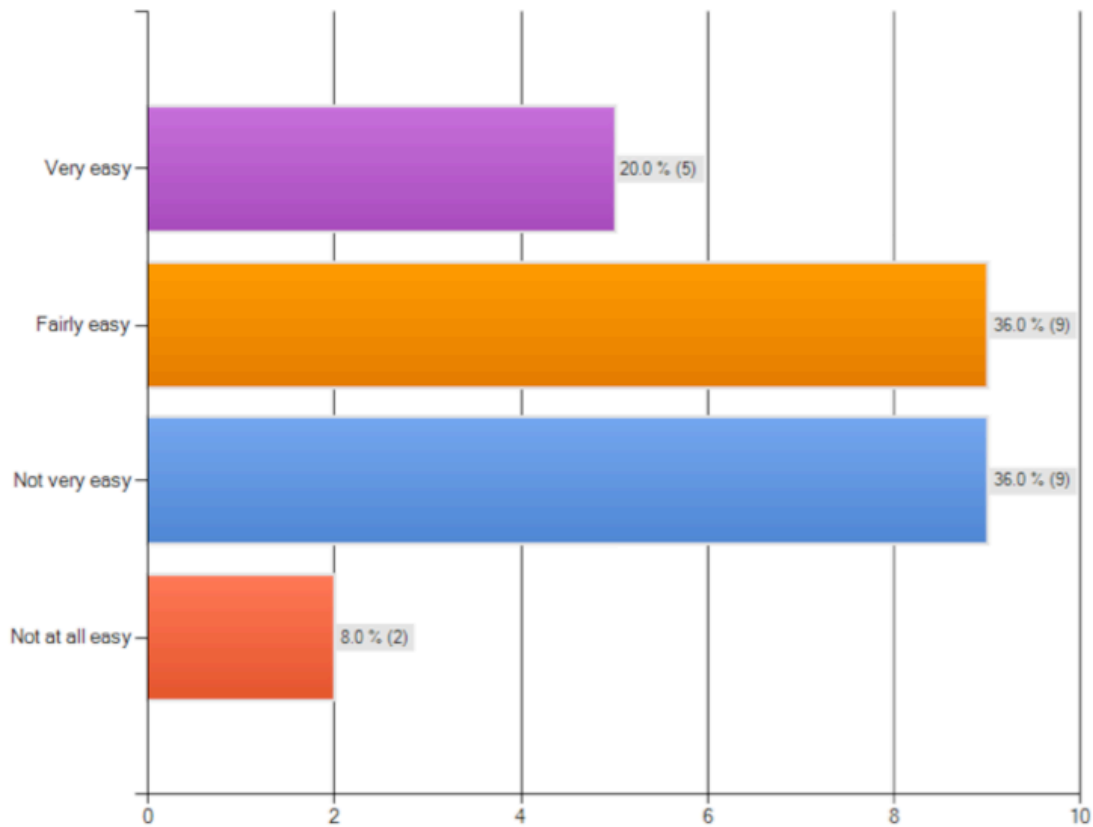
Q4. If you did respond online, how easy was it to input your views online to the consultation?



Comments:

1. I wrote a response and attached it
2. I am not sure at all about what you are asking in this question - it is poorly worded. I am taking the view that you want to know how computer literate people are and nothing else.
3. Am 83 years old and not very computer literate
4. I needed to download everything as I was on 'pay as you go'. I'm now on BT Broadband
5. Found that the questions did not permit me to put my views, thus did not use that format.
6. As in many of these consultations on subjects that depend on broad and detailed technical content and analysis, there is a real problem in pitching the consultation (a) at a level which does not trivialise the science and engineering (b) is non-technical enough to allow a spectrum of stakeholders to engage and (b) involves a small enough effort (and time spent) in responding to allow the involvement of people for whom it isn't their 'day job'. By the very nature of GDA, this ranges from 'very difficult' to 'impossible' - but my personal view is that you have tried very hard and achieved as much as was possible.
7. Bit long ago to remember

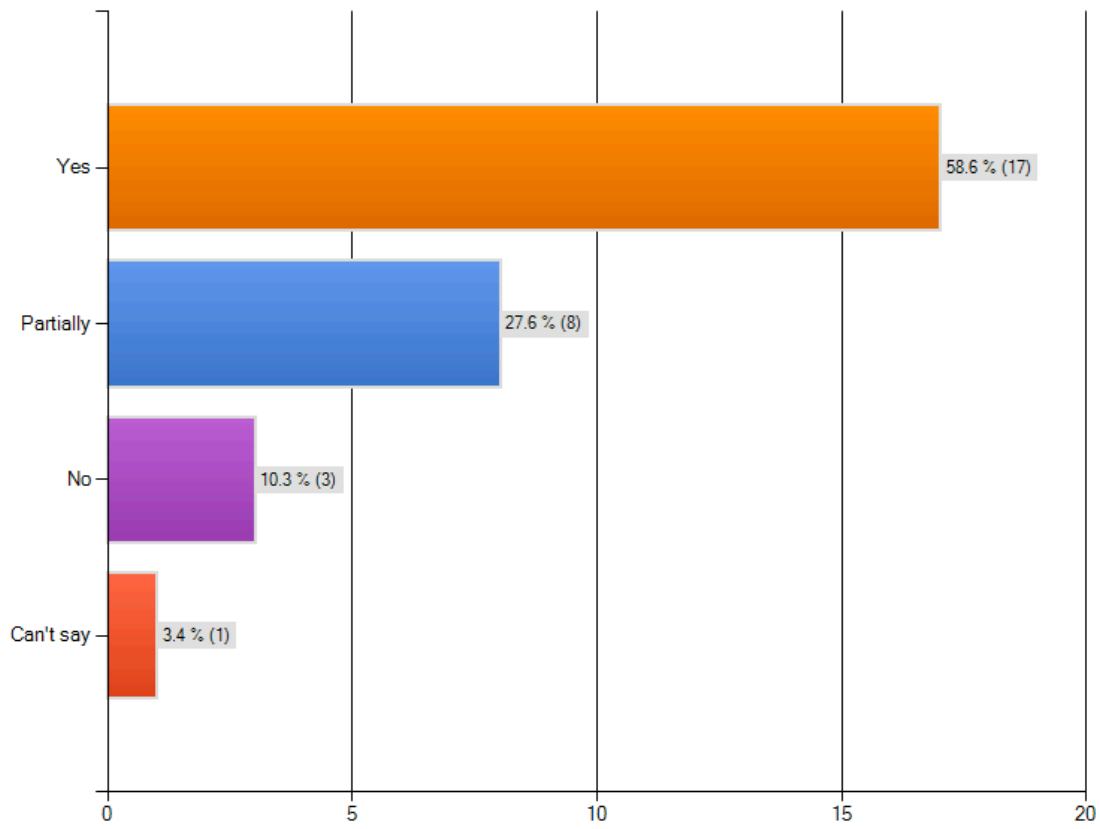
Q5. How easy was it to view the results of the consultation online?



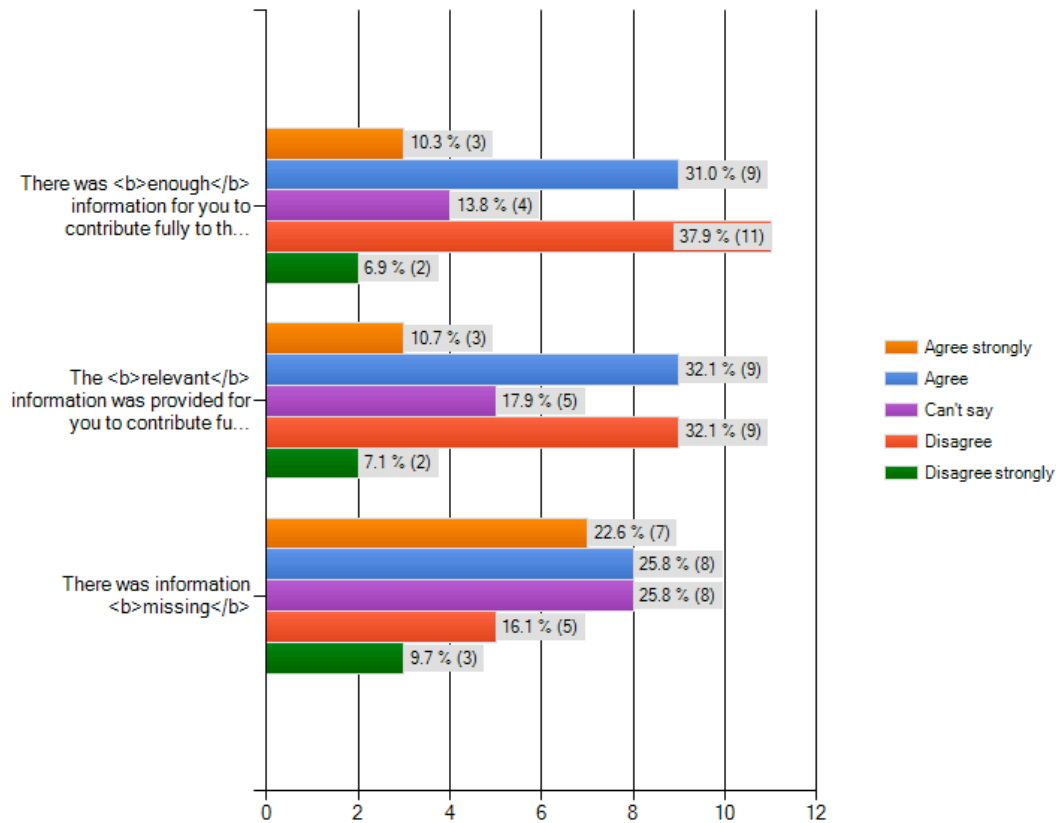
Comments:

1. Not undertaken
2. Different comments to make
3. I had to ask for guidance
4. haven't tried
5. See above
6. I didn't get round to it
7. The actual process of bringing up the responses is quick and easy - so the 'ease' of viewing relates solely to the volume of replies. So difficult to see how any major improvement could have been achieved.
8. Err what result? I have not heard anything pertaining to my comment. There may have been an anodyne "it is going into blah blah..." which is not a response in my book but a computer generated acknowledgement
9. No acknowledgement of receipt and no answer received to my questions.
10. as of yuer [??] our queries remain unanswered

Q6. Was the purpose of the consultation clear?



Q7. Thinking about the information provided in the consultation documents, do you feel that:

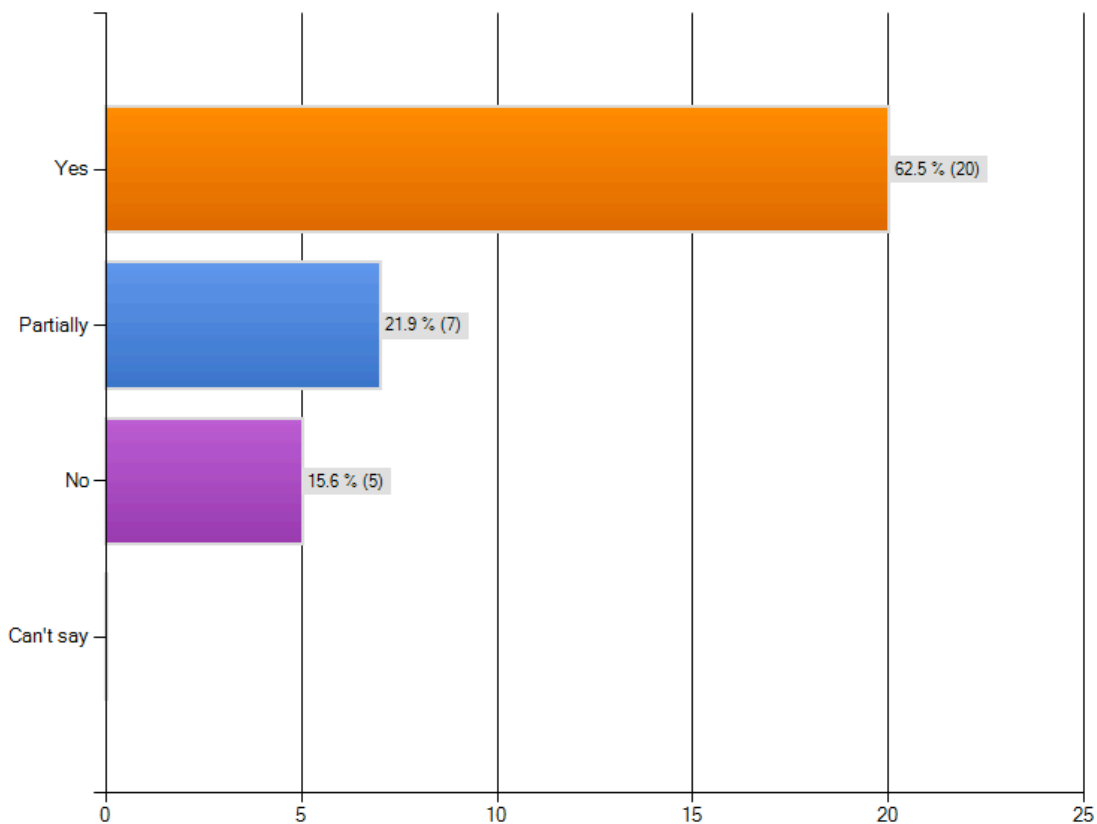


Please identify any information you feel was missing:

1. Realistic assessment of uranium supplies
2. There was a huge amount of material to get through, but having read it all it didn't seem to cover everything. I was expecting a much better critique of the NDA's Disposability Assessments.
3. As above
4. A non-technical summary outlining the issues for affected communities would have been helpful. Not everyone who wants to reply to the consultation would have understood the complicated documents.
5. Spent PWR irradiated fuel reprocessing to permit fissile material recycling and to avoid the massive proliferation of very radioactive PWR spent fuel on every PWR site nationwide for 160 years to await a GDF which has not chance of being built in a 1000 years because of NIMBY activity. The CoRWM and DECC and the Government are wrong and must change their policy to gain public acceptance. If the Government says they had had few objections this is because people do not understand. If they object to a GDF they will certainly object to a Spent PWR Irradiated Fuel Store on every site. The public have no awareness of the scale, duration, and cost of the government policy. The developer did not include an adequate and explicit statement on the site processes associated with spent PWR fuel. Also the developer omitted to provide specific detailed requirements for Townswater Consumption for PWR Reactor Operational purposes. It turns out that the Wylfa B Townswater demand will be more than 3 times that of Wylfa A = 2,400 000 M3 per year. Welsh Water cannot supply that from existing water sources so the developer will have to provide an enormous Desalination Plant which will produce an effluent which will have to be disposed of safely without adverse effects on the environment. No information has been provided as to how this will be done.
6. Ought to include option - there was TOO MUCH information
Assertions were made rather than concrete evidence presented eg on radioactive waste disposal and health impacts
7. Re EPR... there was no information regarding EDF's filtering or sensor mechanisms for example used in their operations in France. The EA seemed to take on trust what EDF stated more than once. The EA had made a decision already that EDF's information was trustworthy. I disagree yet I had no opportunity to evaluate myself. Secondly, I couldn't contribute fully to the consultation because I had only 10 days to look at the EPR offering only. Up till then I had been fully focussed on the EDF Stage 2 consultation regarding their plans for new build at Hinkley Point. Consultation Fatigue is a genuine phenomenon. When is somebody going to say these consultations are all flawed because we are not given sufficient time or opportunity to fully engage.
8. potential impacts on fish stocks
9. Counter arguments, esp re: geology of area
10. Difficult to prove a negative!

- 11. The case against nuclear power was not set out
- 12. There was no input from independent nuclear consultants like John Large Associates whose lecture on the EPR I attended in Autumn 2008 in Bridgwater, Somerset. The regulators are too dependent upon unsupported statements from the nuclear industry like EDF who have an interest in getting their French design approved at all costs.
- 13. Adverse criticism of the proposed designs did not form part of the information.
- 14. Think we would have liked to see more information/or information set out more clearly on where the opportunities had been to comment in the past and where the future opportunities would be eg there were things we may have wanted to say but it wasn't clear if we had missed the opportunity or if the opportunity would exist in the future.
- 15. There were so many aspects of the design, including critical descriptions of the command and control systems, that the consultation was effectively pointless and just conducted to mollify the pressure from the nuclear industry.
- 16. "information for you to contribute fully to the consultation...." was not sure if my comments were considered relevant but where else was one to make them. It was about the construction process. to whit the use of quieter pile drivers
- 17. much relating to aquatic discharges of alpha emitters, everything related to fuel manufacture

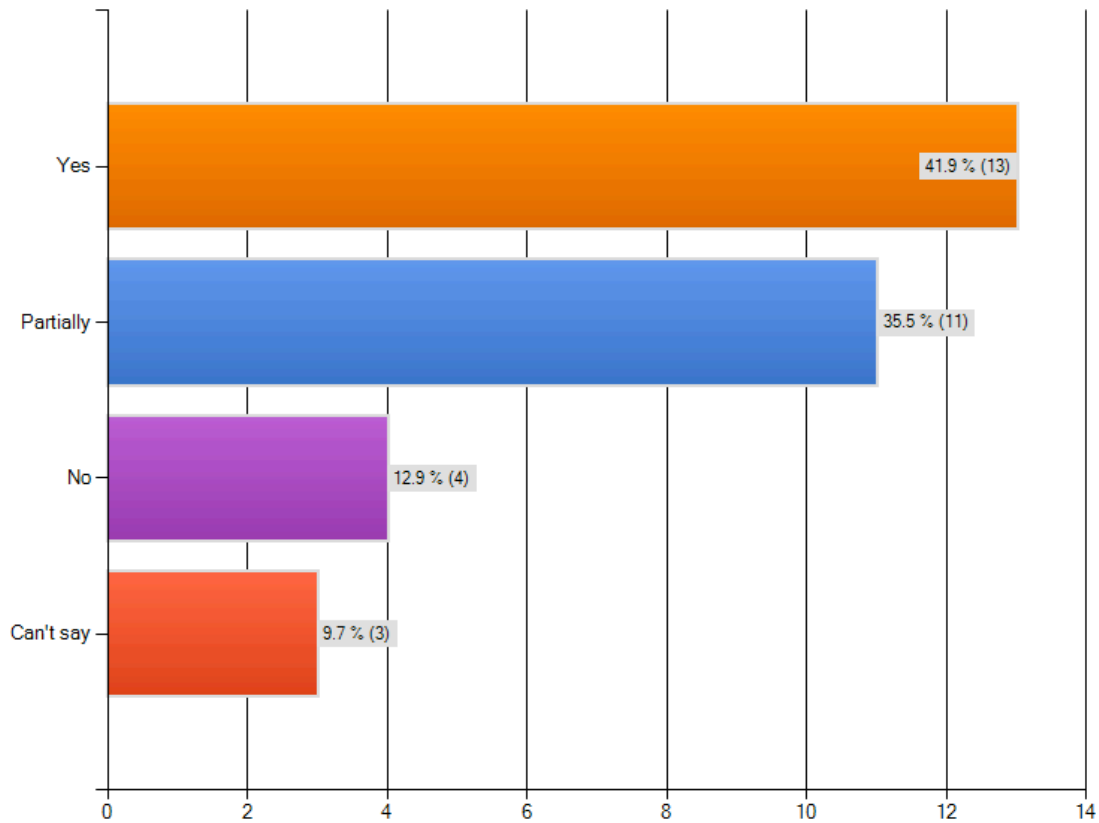
Q8. Were you able to express your views fully in the consultation?



Comments:

- 1. I attended the meeting in Birmingham, and was deeply disappointed, The way the discussion was handled reduced everything to the lowest common denominator. Only the "most popular" questions were put to the speakers, not those of the greatest importance, e.g. with reference to structural integrity, plant monitoring, surveillance, etc..
- 2. We did not respond as we felt the situation as described in the docs were hard to interpret, and not realistic in the local situation. Or as known nationally as multiple reactors appear to be what are being considered.
- 3. Too much to do
- 4. ... by putting our comments in a letter, we could say what we felt needed to be said
- 5. See above
- 6. I'm not actually sure I completed this particular specific Generic Design consultation as I've been concentrating on stopping the public health damage from Hinkley Point discharges into the atmosphere of poisonous gases like plutonium, Caesium 137, Iodine 131, etc etc
- 7. Only those with the greatest resources, i.e. the industry and associated pro-nuclear bodies could have had sufficient knowledge, thus giving them a very unfair advantage. Because of their early engagement, they also had most time to respond.
- 8. Mainly though because we wrote a letter rather than filled in the boxes.
- 9. The consultation information was necessarily highly technical and in large part outside of our expertise

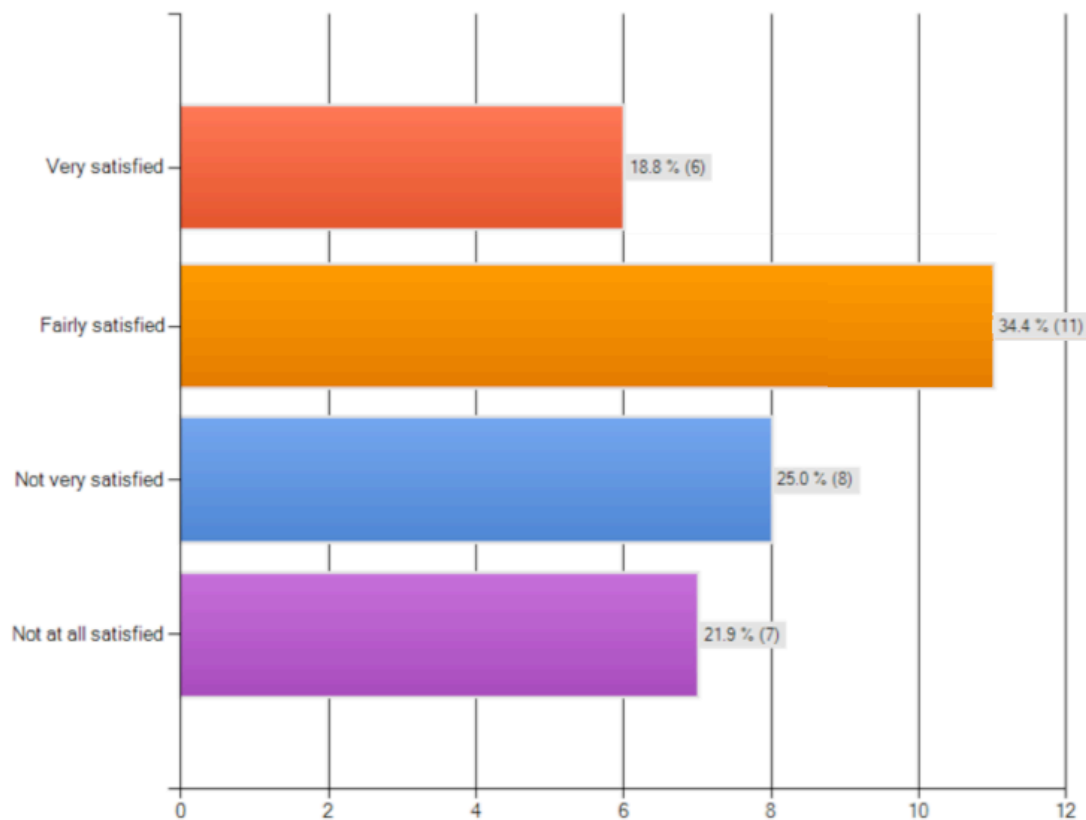
Q9. Were the questions in the consultation clear and easy to follow?



Comments:

1. They were not always orientated to the issues I wished to respond on. I think it should be made clear that responses do not need to be structured around pre-formulated questions.
2. I rarely find questions in consultations helpful.
3. Did not include the right ones
4. Our response did not follow the questions
5. See above
6. I didn't read a consultation document I just emailed in my comment which was replied to, and taken forward for consideration.
7. But heavily biased in favour of EDF's application for EPR approval
8. They directed respondents only to those aspects of the consultation that the proposers wished addressing, ignoring peripheral matters.

Q10. How satisfied are you with the way the consultation was structured overall?

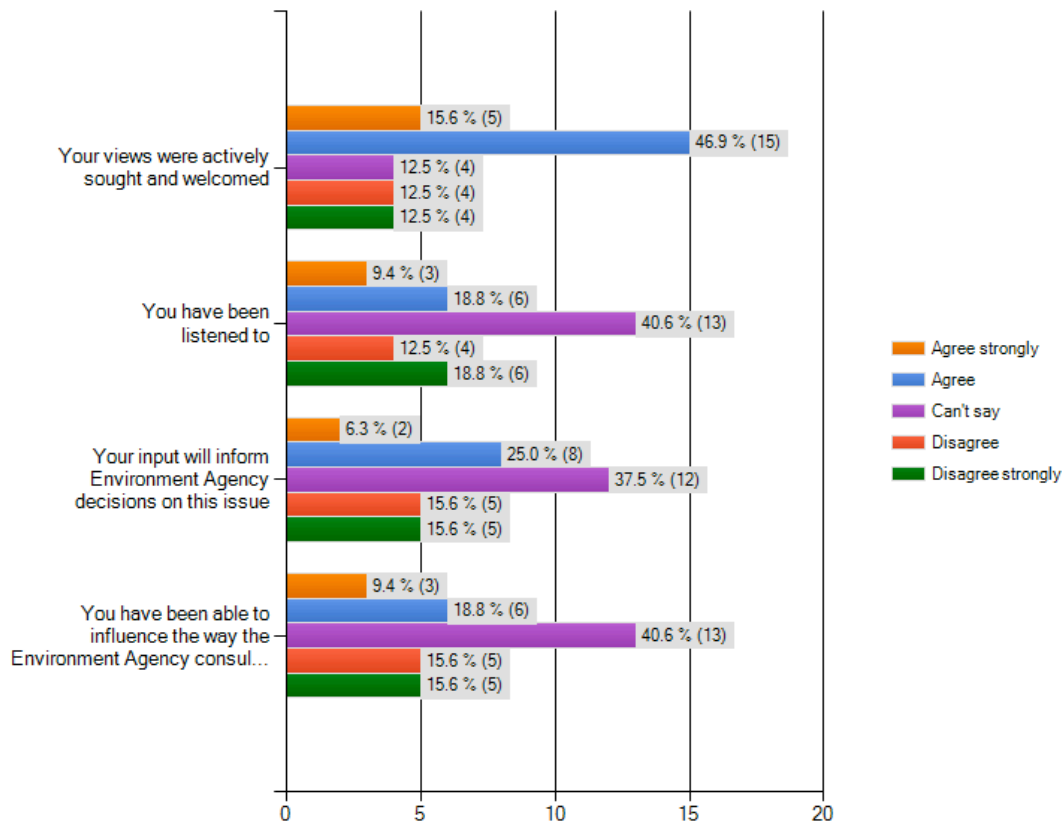


Comments:

1. There was a HUGE flaw in the whole procedure, in my (professional) opinion. The EA and the HSE are trying to conduct a "one-off" safety assessment of these reactor designs. But the key question is not "Is it safe to begin with", but "Will it be safe to run for 60 years?" This latter question requires a totally different approach to that which has been used traditionally in the industry. None of us really know for sure what will happen to materials exposed to such extreme conditions for such a long period of time - we have never done it before, in human history. What we have to be able to do is to MONITOR and INSPECT the reactor at regular intervals (just as one would an aircraft), to check that everything is still OK. So key criteria for evaluation of next-generation reactor designs MUST include "get-at-ability" - how easy is it to get equipment in and out of the reactor, to check on its condition? Also the reactor needs to be equipped with the equivalent of a "central nervous system" - a set of sensors and diagnostics, so that if it is "in pain", it can inform the operators of the nature and source of its problems. I could not find ANY mention ANYWHERE in either of the two lengthy consultation documents of anything remotely relevant to what I am 100% certain are two vital issues. I tried to raise these matters at the consultative meeting, and got precisely nowhere. Because these issues were not among the "most popular" questions raised, they never got put to the panel. I regard this as a complete fiasco - and a potentially dangerous one, at that. The whole approach to safety assessment of these reactors needs to be extensively re-thought. But I despair of finding anyone in the Agency who has the remotest grasp of what I am trying to tell them, despite its crucial importance
2. Actually both I, and the general public, were not made aware that the Environment Agency was responsible for conducting an independent GDA on the Environment Impact Assessment Document submitted by the developer. The developer did make copies of his EIS available to the public in local consultations but did not make us aware that it was statutorily required for an EIS GDA
3. See above
4. I know it was advertised in local papers and there were public meetings.
5. All the new nuclear build consultations I have taken part in have been very heavily structured to encourage responses favourable to the nuclear applicants. As the regulators are supposed to be acting on behalf of the government and the public, these consultations should have been more objectively designed and presented.
6. Every non-pro-nuclear body that we are aware of has complained about every one of the many "consultation" exercises from the start. That there have been so many of them and the process so rushed has precluded many point of view being included.
7. GDA is such a vital part of the approval of new nuclear build that it is a pity that the consultation was taking place before the documents were useful
8. Some major data was not included
 - a: (alpha emitters: see above)

b: fuel manufacture ...the exclusion of which was justified, but the justification itself was both practically and morally indefensible, especially in the context that it is highly likely that the fuel be manufactured in the UK and discharges to the environment will arise. It may have been out with the scope of the EAs brief, in which case the EA SHOULD HAVE EXPLAINED WHO SCOPED THEIR WORK, saying merely that the GDA was about the "operation" of the reactors and thus manufacturing issues were excluded was just not good enough.

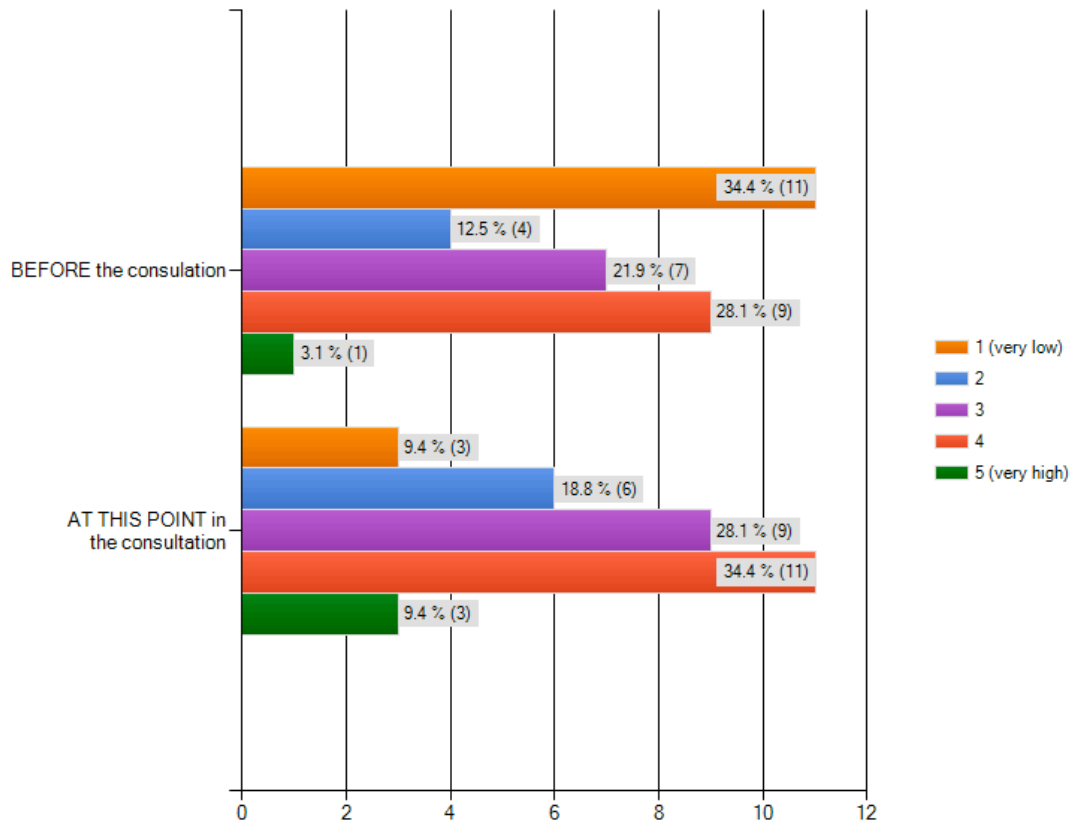
Q11. Thinking about your experiences of the consultation, do you feel that:



Comments:

1. In our response we were critical of the consultation process - please refer to our response for our views.
2. I have referred my comments directly to the GDA by email.
3. I have not just walked in off the street to say this - I am a Fellow of the Royal Society, and Fellow of the Institute of Materials, and a Chartered Engineer. I have spent much of the past twenty years working on fundamental issues of structural stability and integrity of nuclear reactors, and have strong links with relevant government and industrial laboratories in several parts of the world, including the USA, Japan and Europe. I also led the drafting of a key report on this subject for DTI a few years ago - just before it was re-organised!
4. EAW, DECC, and the UK government have already made up their minds what they are going to do and are deliberately ignoring valid public comment and valuable contribution which would assure the success of the proposed PWR Nuclear Power Stations
5. Many people already pointed to plethora of information and too short time for issues to be considered
6. We have some doubts that the EA will "hear" what we are saying, we believe our comments were substantive, yet we have not had any follow-up from EA which might have been expected as a result.
7. The EA have preconceived assumptions that are dangerous.
8. The protests of local campaigners who have suffered illness and injury as a result of existing nuclear power installations have been ignored in the "consultation" on future plans
9. The NDA informs us that they cannot act to control the current problems with the Magnox reactors at Hinkley Point. The NDA suggest the Environment Agency or various bodies, none of which have been able to take any action, such as getting Magnox South prosecuted for corporate manslaughter for their actions in breach of the 80-year radioactive decay period when they installed vents into the roofs of the Magnox reactors at Hinkley Point in 2006. These decommissioning reactors need to be re-sealed as a matter of urgency; if this is not possible, a sarcophagus needs to be erected to cover both of them up, just like Chernobyl.
10. The standard response to complaints has been to say that the organising body is satisfied with the process. They are not the arbiters - or shouldn't be. The opinion that matters is that of the people who are coming to the process for the first time and, as already stated, they did not find it a useful exercise. Also the Environment Agency is only concerned with up-holding government policy - not what is best for either the environment or affected residents.
11. But what is the point of consulting if the decision is already made
12. NO one has said that my comment was not relevant or it was. or any communication that seemed human.

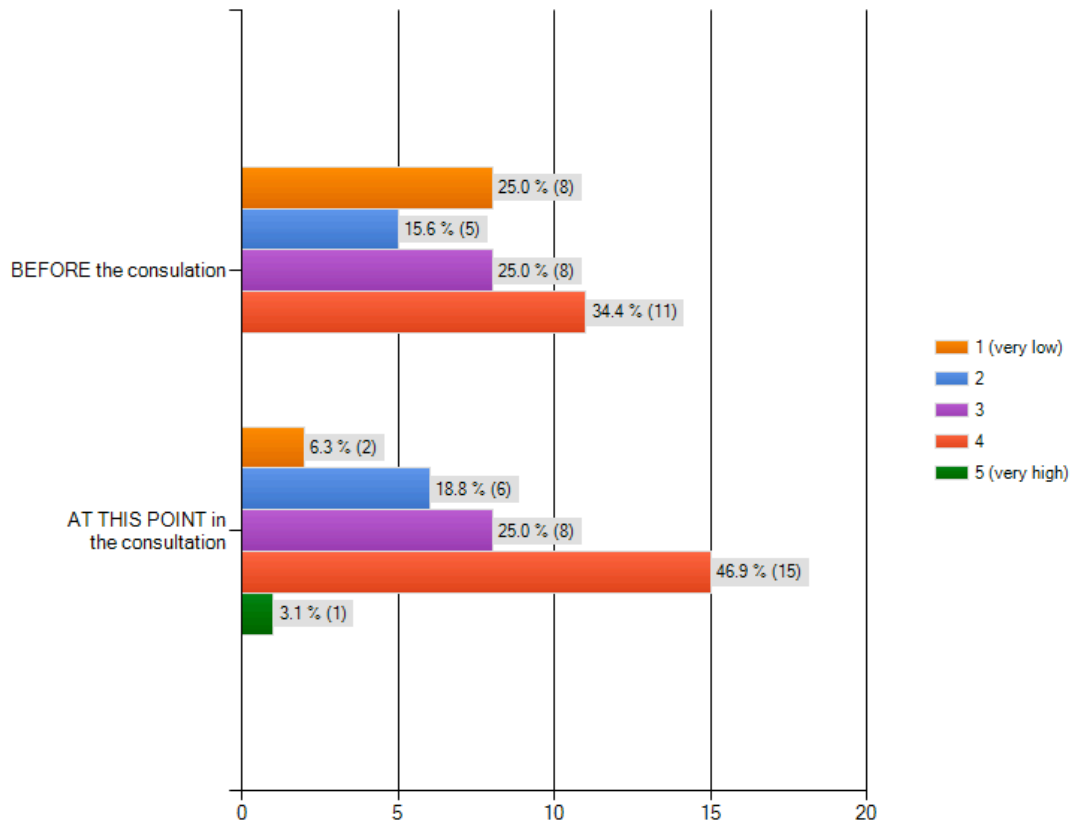
Q12. What was your level of understanding and knowledge of the Generic Design Assessment process?



Comments:

1. We have no idea what attention has been paid to our views. It would appear to be nil because policy and method have not been changed.
2. During the Hinkley Point Public Inquiry topics were divided up and evidence presented and cross examined so that it led to a shared baseline of knowledge. This split of the process is not conducive to understanding what is being proposed and what the dangers are in a local context
3. The whole process seems to be merely a white-wash operation to cover up a volte-face in the Secretary of State's decision-making since entering the coalition
4. I attended John Large Associates lecture in Bridgwater in Autumn 2008. I have suggested that the GDA should commission a report from him on the EPR before making any decision on allowing EDF or any other developer to submit applications to the Infrastructure Planning Commission which I support as the only way to get anything sensible like wind farms and the Severn Barrage past ill-informed local authorities and action groups.
5. As non-specialist members of the public our knowledge has come from anti-nuclear groups, and other informed bodies. It is patently obvious that one size does not fit all - convenient though that would be for the nuclear establishment who appear to be running the whole exercise.
6. 'Level of understanding' covers a spectrum from 'knowing what the process is aiming to achieve' to 'I could do all the calculations myself' - clearly the first end of this spectrum is the only feasible level that will get responses.
7. I am not sure if my comment was relevant to the GDA . My understanding is that the use of less quieter drilled piles requires the construction to be designed with them in mind from the start

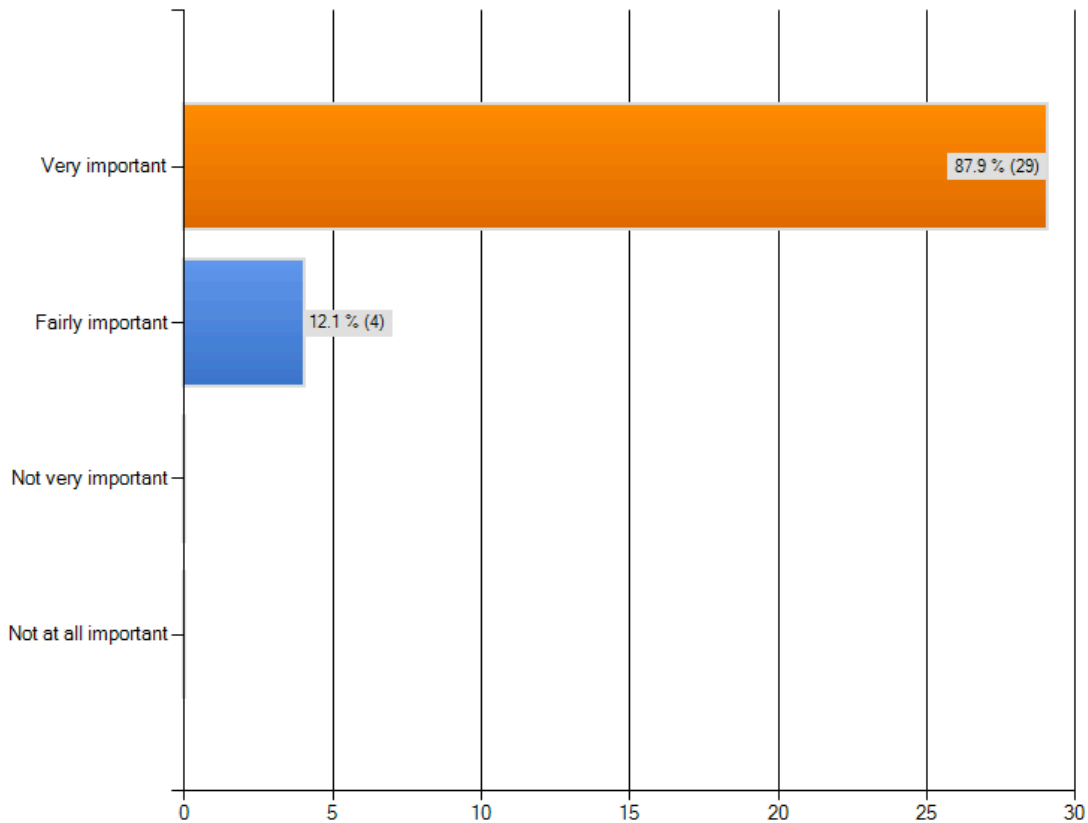
Q13. What was your level of understanding of the role and responsibilities of the Environment Agency in the GDA process?



Comments:

1. The EA has a particular role to play
2. A genuine referendum at grassroots level would yield a very different result
3. It's still not clear to me what the Environment Agency can or cannot do. This is complicated by the fact that apparently those working with nuclear sites are in fact paid by the nuclear operators.
4. As previously remarked, the Environment Agency is misnamed - it is not predominantly an agent for the environment. It is merely a tool for the implementation of government policy. It is a pity that they do not have more interest in the environment and the people they misleadingly purport to represent the interests of.

Q14. How important do you think it is for Environment Agency to consult stakeholders and the public on these sorts of issues?



Comments:

1. It is important for the EA in order to confirm that it has consulted. NGOs are unlikely to feel that participation is much more than a legitimisation exercise for government. The key decisions have been taken. Concerns about flooding of sites etc. which affect NGOs do not seem to figure prominently in the issues.
2. The safe operation of nuclear reactors is a paramount consideration as the effect on the surrounding environment could be catastrophic.
3. I think the Agency should pay more attention to the views of well-informed scientists and engineers, and not merely give such people equal weight with the chairpersons of the average Parish Council. That is Political Correctness gone mad.
4. We would be interested to know how many people actually responded, we would hope local authorities had an input.
5. BUT it needs to improve the manner in which it does it - give consideration to making the information accessible and time for working members of the public to follow in and participate in the process
6. They might actually learn something but I do not have a great deal of faith in their ability to be flexible enough in their thinking. They are too complacent about the adequacy of their own processes and attitudes, and too trusting in the nuclear industry itself and seem to be under pressure to pass things as acceptable now, for later scrutiny at the site specific stag
7. Local taxpayers and council-tax payers should be given a vote on development plans on this scale and import
8. It would be more effective if the Environment Agency carried out its own research by commissioning reports from independent experts, free from government pressure via committees containing lobbyists for the nuclear industry.
9. We are not sure of the definition of stakeholder in this context, but would have considered that potentially-affected residents should have been consulted from the very first. Instead of which, politicians, quangos, and the industry (recently demonstrated via the Redfern Enquiry Report to have an profound effect on Cumbrian politics and the community there) have all got together many years before the proposals were released to the public, who were then given scant time to cobble their case together through multiple "consultation" exercises. Some of which didn't even have the courtesy to acknowledge receipt of our submission.

Q15. What were the most useful elements of the consultation for you? And please say why.

1. Periodic reports by GDA
2. The documents showed me where the (massive) gaps were in the whole appraisal process
3. Being able to obtain hard copies of some of the material was helpful, given the vast amount of reading required.
4. It prompted me to take a closer look at our existing nuclear power plants. If these designs reflect BAT now, what on earth were our original designs like?
5. The meeting in Birmingham helped to set the context
6. Availability of information on reactor designs and intentions
7. explanation of the scope of the EA role & responsibility in relation to GDA.
8. Adequate time was allowed for consultation among our members before formal submission. It did not feel 'hurried'.
9. Web pages and regular email alerts from the Regulators on the progress. Also the holding of one meeting at Birmingham
10. Gives one the opportunity to express one's rage and beat on the doors of Whitehall however futilely. (cf campaign against the renewal of Trident just kicked into the long grass)
11. I have had a meeting with Phil Heaton but he seemed to be quite restricted in what he could actually do about Hinkley Point's appalling safety record.
12. None. They all failed abysmally to consult those directly affected. Not one question posed at any of the meetings has been answered. Questions written to DECC, Lord Hunt, Sir Gus O'Donnell, and the Prime Minister remain unanswered after nearly two years.
13. Reading the documents EA prepared
14. None. The decision had been made and the documents were published although incomplete
15. As one of the requesting parties, it is important that our reactor design has been subjected to full scrutiny, and that this is done in an open and transparent way
16. Just the ability to make some form of contribution and criticism.
17. the public disclosure of a wide range of technical information more or less gathered in one place
18. Staff at EA were very helpful with providing digestible guidance on the two reactor types

Q16. What were the least useful elements of the consultation for you? And please say why.

1. Local issues, like coastal erosion. I prefer to stick to the economic and technical issues of ageing and safety.
2. The meeting convinced me that no one involved in the GDA was likely to take the slightest notice of what I had to contribute. They were pottering along in their usual way, thinking along pre-existing tramlines, and did not want to be perturbed in any way, shape or form.
3. The whole exercise seemed to involve a huge amount of information which was all very superficial. Nothing quite got to the nub of the issues. Lots of reading cast no extra light on the subject at all. The Birmingham Stakeholder meeting was poor.
4. There is no indication of where paper copies of the Consultation were housed, there was little or no media attention to it, if you did not have a computer then people had NO knowledge that it was taking place. No local meetings were called to our knowledge. Our major concerns are that the type of Nuclear reactor in the consultation has no known record or operating history. There was no indication as to where we could find any information on the type of reactor suggested.
5. All references to Safe Dose regarding levels of emissions, etc. This reliance on the discredited ICRP risk/dose model has no relevance in the modern day and continued upholding of its application when assessing risk is, in my view, negligent of our regulators.
6. Amount of paper; lack of key evidence; time available
7. GDA had already been completed to a significant level, based on out-moded technology decisions, not representing BAT
8. N/A
9. Some of the time wasting in the workshop - by people who should have known better.
10. At Birmingham the content of some of the presentations was poor. Large amount of information available but not always clear on website what was old and what was updated.
11. The knowledge that one's responses will be buried somewhere in the vaults of Westminster and decisions will go on being taken behind closed doors under totally different criteria
12. The lack of action by the Environment Agency to control the nuclear industry; the only positive thing they have done is to announce that there was "an authorised release of radioactivity in 1994". This event caused increases in public deaths through cancer but no action was taken against the operators as far as I am aware.
13. The consultation meetings which failed to listen and to answer the questions posed.
14. In the EA's area of regulation, the two designs have very similar characteristics and challenges (much more so that for the HSE) - thus having two separate documents duplicated much of the effort of responding. In the end I only responded on the AP1000, but virtually all my comments would have also applied to the EPR - but I had run out of time/effort.
15. Trying to follow up on the result on the web - difficult to follow the logic of the web site
16. Initial lack of awareness of existence

17. the omission of significant suites of relevant information, because their omission means that both EA and public understanding of all of the issues is less effective than it needs to be
18. For us the highly technical nature of the consultation meant that in large part we were unable to offer an informed opinion

Q17. Overall, what can the Environment Agency do to improve how it involves the public and stakeholders in any future consultations?

1. It might undertake a more in-depth engagement with local publics seeking to explain what is being proposed and explaining why local sites should host high level radioactive wastes in very vulnerable locations indefinitely.
2. Match the presence of DECC officials in local meetings.
3. I don't think the Agency understands how to undertake such a highly technical assessment. Much more specialist input is needed, including wide-ranging consultation with the scientific and engineering community. This is not just a "jolly", or a "facilitated interactive meeting with the public". The health and safety of vast numbers of people depend on getting it right.
4. EA needs better advice on how to present complicated scientific and technical issues to the public in a way which provides the information they need, without being simplistic, but without providing so much information they are put off participating.
5. See above
6. Making sure the consultation material including the reports are easier to understand by non-technical people.
7. Listen, act, don't just go through the motions.
8. Set up a means by which the technical information is translated and condensed/shortened without losing the accuracy to enable people to take part
9. Overall, I think the the consultation has been well-managed and comprehensive
10. perhaps make the front page of the EA website more comprehensive & clear
11. No real 'lessons learned'.
12. No major comment, just keep improving and trying to make things as easy as possible.
13. Carry out genuine comprehensive referenda, with full dissemination of the facts on both sides of the proposals in local press, media etc and publishing of the results in same,
14. Continue to advertise using all sorts of media - perhaps coloured adverts, newspaper ones were not very eye catching. On Buses in local area. Involve celebrities to promote campaigns? remember not all sections on society are on line.
15. It would help if the Environment Agency knew what powers it had to manage the nuclear sites in the UK because so far, it seems as if they do very little other than support the operators and resist any complaints from the public or stakeholders.
16. Primarily represent what would be best for the environment, not solely carry out the government's policy! They could also try actually listening to people. Just because someone states a contrary point of view does not mean that they are irrational beings.
17. The level of effort is commendable - you'll always produce the 'wrong' answer for at least 30% of the respondees - but that does not mean that the exercise is not extremely valuable.
18. face to face meetings
19. Only issue documents when they are "fit for purpose", not for the government, but for an intelligent but not expert a member of the public
20. reply
21. The gap between publication of the documents and the stakeholder event could have been a bit longer to allow people to be better prepared.
22. I was not aware of any public consultation meeting organised by EAW. If these were held were they advertised. Why did I miss this when I was made aware of the DECC public consultations.
23. Consult more closely with stakeholders with regard to the scoping of any further GDA process, in other words, ask stakeholders what they want to see being assessed
24. Process was fine but perhaps a highly technical consultation like this particular one would have benefitted from provision of some "entry level" information

Q18. Is there anything else that you would like to add?

1. Please see my articles on nuclear marked with an * on <http://www.after-oil.co.uk/articles.htm>, especially EN6 which was submitted as my part of the consultation.
2. I think that what I am advocating is plain common sense. The more complicated a system becomes, the more hostile the conditions it has to operate under, and the longer it has to keep going, the more important it becomes to include the most robust diagnostic instrumentation, and to design in the ability to get surveillance equipment in (and out) to carry out inspections of key areas that are at risk of (e.g.) corrosion, erosion, wear, fatigue or creep. Yet these parameters do not appear to feature anywhere in the whole GDA exercise
3. If it is felt that the consultation was undertaken incorrectly what steps can be taken to reconsider the outcomes.

4. As the Environment Agency fails to routinely test for uranium in our UK environment or, indeed, for any of the lower activity radionuclides and didn't know the Enriched Uranium contamination at the proposed Hinkley Point C site was there (see Green Audit report Jan 2011) - contamination that potentially will apply to every nuclear site - their ability to demonstrate competence in protecting people and the environment must be brought into question. It follows, therefore, that they may not be fully qualified or reliable to assess the design and risk implications of the two candidates under consideration in the Generic Design Assessment.
5. Assertions are not the same as evidence and the desire to have an outcome should not dominate the process to establish a robust process to examine the issue fully. An email to the EA in August was never answered.
6. Input very limited so above questions not very relevant
7. No thanks
8. These cynical exercises only add to the disenchantment of the electorate and the diminution of democracy
9. Could the Environment Agency take urgent action now to put a stop to the discharges from the Magnox reactors on the Hinkley Point site, and issue orders for them to be re-sealed in line with the 80-year radioactive decay period. If they know how to get Magnox South prosecuted for corporate manslaughter, could they do that too, as a matter of urgency.
10. The multiple "consultation" exercises seem to have been carried out merely to tick boxes as the current argot has it. There has been no evidence that anything said, other than by the vested interests, has changed the initial proposals; any contrary points raised merely allowing suitable obfuscations to be put forward.
11. I think that having to register on the site puts people off. It would be better to be able to see the documents/consultation first and then register if you want to take part.
12. no
13. I need to look at the GDA Document and my submission again in order to establish my justification for further constructive comment. Please can you supply me with a copy of my comments. I did not keep one.

Q20. We would like to contact some respondents for follow up interviews later in the evaluation process. If you are willing to be contacted, please complete the following section

17 responses

Appendix 3: Stakeholder interview questions

Interviews undertaken by phone in January and February 2012, after the final decision documents were published in December 2011.

The consultation process

- Have you seen and had a chance to read the decision documents published in December 2011?
- Are you satisfied with the information you have been given about these decisions, and the form and content of the decisions? Please give details.
- Are you clear about what the stakeholder involvement in this consultation was designed to achieve, and what difference it would make?
- Do you think that is what happened in practice? Please give details.
- Did the consultation increase your understanding and knowledge of the GDA process?
- Did the consultation increase your understanding and knowledge of the role and responsibilities of the Environment Agency?
- Do you think the consultation provided opportunities for stakeholders who wanted to be involved to influence the consultation process to help it meet their needs?
- Did the consultation encourage and enable effective stakeholder input and responses? What worked best and least well in your view? (e.g. information provided, seminar, online consultation)

Impacts of the consultation

- What do you think were the main achievements of the GDA consultation (if any)?
- What were the main things you and your organisation gained from being involved in the consultation?
- ***Did you get what you wanted from the consultation?***
- Do you feel the Environment Agency listened to and took account of stakeholder input in their final decisions?
- If so, what issues raised by stakeholders do you think made a difference to the final decision?
- Were there issues raised by stakeholders that were not taken sufficiently seriously by the Environment Agency in the final decisions?
- Stakeholder and public engagement obviously have financial costs. Do you think this exercise was money well spent, or not? What do you think would make these sorts of consultations really good value for money? Please say why.

Lessons for future consultations

- How do you think this consultation could have been improved?
- Is there one single thing that you would like the Environment Agency to take account of in designing future consultations?
- Is there anything else you would like to say about your experience of taking part in this consultation that we have not covered so far?