

Subject: Response to DECC consultation seeking views on the application submitted by the Nuclear Industry Association (NIA) for a regulatory justification decision in relation to the Advanced Boiling Water Reactor (ABWR).

Consultation Questions and Responses

1. Do you agree with the Government's preliminary view that the class or type of practice set out in the application submitted by the Nuclear Industry Association:

(a) qualifies as a new class or type of practice; and

(b) is a suitable class or type of practice for a decision by the Secretary of State? If not, why not?

A) I agree that it qualifies as a new class or type of practice and is a suitable class or practice type for a Decision by the Secretary of State

2. Does the application contain sufficient information to enable the Justifying Authority to make an assessment of the class or type of practice in the application? If not, what further evidence is needed?

A) The application does NOT contain sufficient information to enable the Justifying Authority to make an assessment of the class or type of practice in the application

The further evidence required is for the Nuclear Industry itself to be ordered by the Secretary of State to make a item by item comparison of the Risks, Benefits and Justification of Building and Operating a Nuclear Plant as set out in it's [abwr_justification_volume_2_application.pdf](#) document against competing technologies and other possible National Infrastructure electricity generation projects.

In particular, the Nuclear Industry itself should be asked to make a comparison of the Benefits and Risks of Constructing and Operating and Decommissioning an AWBR against the use of Tidal Lagoons for a National Electricity Infrastructure Project, first in Swansea Bay and later in Bridgewater Bay.

DECC have an obligation to ensure they exercise their strategic viewpoint of all competing low carbon electrical generation and choose those which meet the criteria with the lowest risk to the public in the short , medium and long term consistent with other criteria set out by DECC.

As an encouragement for DECC to order the Nuclear Industry to Justify itself against alternative Use of Tidal Power

Tidal Power would,

a) Completely eliminate any radiological risk from a National Infrastructure Electricity Generating Project.

b) Meet the Low Carbon objectives set out by HM Government Directives and Objectives

c) Provide security of fuel from any overseas threats:- the Tide comes in and out twice a day in the Bristol Channel and does not have to be shipped in from Australia or North America as set out in the Nuclear Industries Justification Document

d) Completely eliminate the concerns set out by the Government in <https://www.gov.uk/government/consultations/managing-radioactive-waste-safely-call-for-evidence-on-the-siting-process-for-a-geological-disposal-facility> where, according to the Government's own concerns voiced in that document

"Higher activity wastes can remain radioactive, and thus potentially harmful, for hundreds of thousands of years. "

e) Have an operating life 150 years.

f) Prevent flooding of the Somerset Levels if a lagoon was built in Bridgewater Bay.

g) Could be generating electricity by 2017 in Swansea Bay

3. Do you have any comments on the arguments or evidence in the NIA's application? Are there any additional arguments or evidence which the Justifying Authority should consider?

A) See 3 Above

4. Do you have any other comments on the Secretary of State's preliminary view of the class or type of practice, on the approach of the NIA, or any other options?

See 3 above

5) As part of the further consultation on the draft decision document, the Secretary of State proposes to run public engagement events. Do you have any suggestions about the format of such events?

A) The Secretary of State should ensure that detailed individual replies are eventually sent to all those that respond to this call for public involvement.

Also the reasons for ignoring, agreeing or not agreeing with the arguments raised by the public as a result of this call are discussed in open forum.

The agenda for these meetings should be sent out to all participants in advance.

As a Journalist I have investigated and talked and broadcast facts from those involved in both industries.

These can be heard on

www.terrymechan.com/tidal for the Tidal Infrastructure Project

and

<http://terrymechan.com/decommissioningberkeley> for a Nuclear Power Station Project

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