



SOUTHERN AFRICAN FAITH COMMUNITIES' ENVIRONMENT INSTITUTE

# **SAFCEI's appeal on the long term operation of Koeberg Nuclear Power Station**

**10 September 2024**

# SAFCEI Submissions on the Koeberg LTO

SAFCEI – LTO Application – *REPRESENTATIONS ON ESKOM KOBERG NUCLEAR POWER STATION (KNPS) LONG TERM OPERATION (LTO)* - 16 March 2023

SAFCEI – LTO Application - *REPRESENTATIONS ON ESKOM KOEBERG NPS NUCLEAR POWER STATION (KNPS) LONG TERM OPERATION (LTO) APPLICATION - UNREDACTED LTO SAFETY CASE* - 30 January 2024

SAFCEI – LTO Application - *REPRESENTATIONS ON ESKOM KOBERG NUCLEAR POWER STATION (KNPS) LONG TERM OPERATION (LTO) APPLICATION* - 7 June 2024

The decision to extend the life on Unit 1 by 20 years was made in July 2024. A decision on Unit 2 will come in November 2025.

**Out of the decision came three very important rulings:**

**Ruling 1:** While the NNR Unit 1's containment building is licensed for 20 years, Unit 2 will only be licensed for 8 years because the containment building integrity, in the case of a meltdown, cannot be guaranteed

**Ruling 2:** Eskom needs to have a fully functioning containment monitoring system that tracks the health of the plant. Koeberg's is broken. In the case of a meltdown, the plant's operators may not get accurate information about the air pressure. The IAEA states that Eskom must restore the system.

**Ruling 3:** The containment building's concrete is cracking. The reinforcing steel inside the concrete is, in places, corroding and this will, if not fixed, weaken the containment building. Eskom has known about the problem and the only feasible solution is impressed current cathodic protection (ICCP). The NNR has said that ICCP needs to be implemented in 2025.

# Civil Society Demands:

Without a fully functioning monitoring system, the NNR cannot know the safety of the plant completely. A fully functioning monitoring system must be in place before either unit operates. The license should only be granted once a fully functioning monitoring system is in place.

ICCP has been delayed over and over again. Eskom may delay again. The license should only be given after ICCP is installed.

# SAFCEI's Appeal

The application for long term extension of the license for Koeberg did not comply with the long term operation regulations.

The national nuclear regulator considered out-of-date documents contained in the LTO application, and failed to consider other relevant considerations.

The decision that has been taken is irrational and unconstitutional.

# SAFCEI's Appeal

Grounds of Appeal: 1

**Failure to comply with 5 of the regulations within the regulations for long term operation:**

Integrity of the containment structure  
Monitoring of the containment structure  
Non-compliance with LTO regulation

*A nuclear power station is an inherently highly hazardous installation and requires a fully functional containment monitoring system at all times*

# SAFCEI's Appeal:

Grounds of Appeal: 2

## **Reliance on out-of-date documents**

The application to extend the life of Koeberg unit 1 for a further 20 years included a significant percentage of documents that were out of date. The decision of the NNR was therefore based on irrelevant considerations.

# SAFCEI's Appeal:

Grounds of Appeal: 3

**The granting of a 20 year extension of life for the KNPS unit 1 is unconstitutional and irrational**

The authorization that was granted for unit 1 of Koeberg to operate for a further 20 years is administrative action that is not rationally connected to the power granted to the NNR in the NNR Act.



# SAFCEI's Appeal:

Given the listed deficiencies, the decision is not reasonable and South Africa is failing to meet international best practice.

We are adversely affected by the NNR board of directors' decision to authorise the operation of unit 1 of Koeberg for a further 20 years. The decision violates our constitutional right to environment and our right to fair administrative action.