



17 December 2025

Francesca de Gasparis
Executive Director
South African Faith Communities' Environment Institute (SAFCEI)
Email: francesca@safcei.org.za

Dear Francesca de Gasparis

Reference: K10001925N – NNR Directive: Regulatory Oversight of Long-Term Operation Conditions.

The National Nuclear Regulator (NNR) acknowledges receipt of your correspondence dated 2 December 2025, in which you request confirmation as to whether Eskom has met the conditions contained in the NNR Long-Term Operation (LTO) Directive within the stipulated timeframes.

The NNR notes that the conditions referenced in your letter comprise a combination of requirements issued through the NNR LTO Directive and activities contained within Eskom's Periodic Safety Review (PSR) Integrated Implementation Plan (IIP). It is important to clarify that the PSR IIP milestones referenced in SAFCEI's letter constitute Eskom's internal project management schedules and do not represent regulatory commitment dates referenced under the LTO Directive.

The NNR's response is provided below.

1. Compliance with actions arising from the NNR Directive

1.1 Hardened Water Supply (Modification 12008)

Regulatory Due Date: January 2025

Eskom did not meet the regulatory due date stipulated in the NNR Directive. As a result, the NNR exercised its statutory enforcement powers and issued a formal enforcement directive to Eskom on 18 March 2025. This non-compliance is being actively managed through the NNR's enforcement and compliance monitoring processes, including regulatory follow-up and inspection.

1.2 Hardened Water External Connection Points (Modification 12004)

Regulatory Due Date: October 2025

Eskom likewise failed to meet the regulatory due date for this modification. The NNR issued an enforcement directive on 15 December 2025. The Regulator is monitoring Eskom's corrective actions and will take further regulatory measures should compliance not be demonstrably achieved.

The NNR emphasises that failure to meet regulatory deadlines triggers enforcement action and continued oversight until compliance is verified.

2. Activities arising from Eskom's PSR Integrated Implementation Plan (IIP)

The following activities referenced in your correspondence fall under Eskom's PSR IIP and are not regulatory commitment dates imposed by the NNR:

- Review of CASK PSA subsumed initiators
- Revision of the internal flooding methodology in line with international best practice
- Updating of internal hazards analyses for the Spent Fuel Pool PSA
- Review and updating of PSA reports using plant-specific data
- Improvement of radioactive discharge estimation processes and public dose assessment

Eskom has scheduled these activities for completion by August 2029. The NNR will verify implementation of these actions when they are completed and will determine regulatory acceptability based on safety significance, adequacy, and compliance with applicable regulatory standards.

3. Actions with regulatory due dates at the end of December 2025

The following actions are required to be completed and submitted by Eskom by December 2025 and are subject to regulatory assessment:

- Assessment of the effectiveness of the Koeberg Nuclear Emergency Plan and associated disaster management infrastructure, in coordination with the City of Cape Town

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- Submission of the External Events Level 2 Probabilistic Safety Assessment and update of the Emergency Plan Technical Basis
- Validation of the seismic assessment in the 15–45 Hz frequency range and submission of updated floor response spectra
- Development and submission of a Seismic Probabilistic Safety Assessment
- Accelerated ageing tests on aseismic bearings and evaluation of their impact on overall plant safety margins
- Evaluation of remaining safety margins arising from post-Fukushima reassessment requirements
- Reassessment of surveillance procedures, frequencies, methodologies, and acceptance criteria

The NNR will only confirm compliance after the expiry of the regulatory due date and completion of its independent technical review. No determination of acceptability can be made prior to this process.

4. Cable testing and re-qualification

Completion of cable testing for re-qualification of qualified cables

Regulatory Due Date: December 2025

Eskom submitted documentation related to cable testing and re-qualification to the NNR in November 2025. This submission is currently under regulatory review. Acceptance will depend on the adequacy of the technical justification and demonstration of continued safety performance.

The NNR reiterates that regulatory compliance is verified through independent assessment, inspection, and enforcement, not through project schedules or self-reported milestones. Where non-compliance is identified, the NNR applies appropriate enforcement measures to ensure that nuclear safety is not compromised.

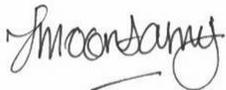
It must be noted that the LTO decision was based on the LTO safety case whilst the PSR identified safety improvements to be implemented within a period commensurate with the 10 year periodic safety review. The LTO directive therefore ensures that the safety improvements are implemented before the next periodic review being conducted.

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The NNR remains committed to exercising independent regulatory oversight to ensure the protection of the public, workers, and the environment. Regulatory actions are taken where non-compliance is identified, and compliance is verified through structured assessment and inspection processes.

Yours sincerely



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Gino Moonsamy
Manager Communications and Stakeholder Relations
National Nuclear Regulator