

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: SZC operational WDA - x1 request for clarification and x1 request for copy of tech report TR217 (to aid drafting of WDA HRA)
Date: 21 February 2022 15:14:02
Attachments: [image001.gif](#)
[image002.gif](#)
[image003.gif](#)
[image004.gif](#)
[image005.gif](#)
[image006.png](#)
[TR217 CBP production report BPE_Rev1.0 - 2022.pdf](#)

Hi [REDACTED],

I hope you are well.

We have been in touch with SZB and NGL to confirm some of the information you requested. Comments in red below for clarity.

[REDACTED] - please can you liaise with [REDACTED] to get this information logged and out formally if required. I anticipate the attachment might need to go through official channels.

Please get in touch if you need any more information.

Kind regards

[REDACTED]

1. a.) Please confirm if any additional date information is now available regarding the targeted dates for commencement of hot functional testing for each of the two EPR units? This is just a point for clarification within our HRA, and we would just like to confirm our current understanding (based on the information we have available) is correct regarding anticipated dates is correct (as far as in reasonably possible given this discussion is regarding activities almost 10 years in the future)

From our understanding based on the main supporting info provided to date (i.e. Appendix A SZC WDA report and Appendix B (TR193), Appendix C (HRA) etc), there are no indicative dates referenced for the commencement of hot functional testing. However, some timeline details were recently provided amongst SZC's second response to Sch 5 No.5 on the 14/11/2021 (attached above for ease of reference).

Within your response doc, paragraph 1.4.14 includes a timeline on page 17 of the report and page 18 of PDF (understood to be taken from Annex H of the Deed of Obligation, doc REP10-082 in the DCO examination library) with references to anticipated commissioning and operational dates for SZC's EPR units 1 and 2 (based on 2033 and 2034 respectively).

Based on the wording within App A and App B of your WDA supporting info docs, the HFT phases for each reactor unit appear to occur only a short time before they become operational. Based on this text and the timeline references above, we have proposed to include the following wording for clarity in our WDA's HRA: *SZB is expected to continue to operate until 2035 (although there is potential for an extension of SZB's operational lifetime by 20 years to 2055 at the latest), and there will therefore be a period of overlap when both stations are operating, with SZC Unit 1 programmed to begin hot functional testing and become operational in 2033, while SZC Unit 2 is programmed to begin hot functional testing*

and become operational in 2034.

Please see the text below on the current position of the SZB life extension.
The text highlighted in yellow reflects the current anticipated timeline for SZC.

Please confirm if our understanding of the above anticipated dates for commencement of HTF for each EPR unit is realistic/clear, as we are also unsure what the proposed timescale is between commencement of HTF, and then completion of HFT moving to operation (is this six months for example? (**HPC currently anticipates HFT to be around 6 months but we will know with greater certainty in due course**)). As explained, this required purely for clarity in our HRA on anticipated dates, so we can edit this if we are incorrect and/or new information is available which replaces the current understanding.

b.) In the above suggested wording, we have referenced the current SZB operational timescale of 2035, and the potential extension of SZB's operational lifetime by 20 years up to 2055.

This information is stated within Appendix A of your main SZC operational WDA supporting report (page 240 of report, page 241 of PDF) which is a publically available document, as it was publicised via our Citizen Space website (link provided below) when the WDA permit was duly made. Please could you confirm if and when the proposed 20 year extension for SZB will be publicised officially? Or if this is currently available, could a link to the relevant official website or copy of the statement be provided?

- Link to the 2020 duly made SZC operational WDA application publication via Citizen Space: <https://consult.environment-agency.gov.uk/psc/ip16-4ur-nnb-generation-company-szc-ltd-cb3997ad/>

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Further to the Environment Agency's statement, Sizewell C Co.'s application for an Operational Permit makes reference to the potential for an extension to the generating life of SZB, I can confirm that the Examining Authority tasked with considering our application for a development consent order asked the following question as part of its Round 2 Questions:

"Policy and Need - The Planning Statement Update [REP2-043], Appendix A, paragraph A.1.29, states that Sizewell B is currently scheduled to close in 2035. However, it is noted that it is potentially subject to proposals to extend operation by 20 years to 2055. Please provide any further information that is available regarding the potential for the operational life of Sizewell B to be extended and any timeline for such a decision to be made?"

SZC Co. responded with the following, and no further challenge nor request for information was sought by the Examining Authority on this matter thereafter:

"The potential for the extension of Sizewell B's lifetime is a matter for discussion between EDF Energy and the regulator and will be made public when appropriate – the publicly available position is as follows:
(https://www.edfenergy.com/sites/default/files/szb_report_january_15.pdf) flags that: "the industry regulator confirmed Sizewell B meets its safety case to continue delivering low carbon power to over 2million customers until 2025 and the station is already working on the case for the next ten years to ensure operation to at least 2035. This is the station's current stated lifetime ... EDF Energy expressed its aim to extend its life for 20 years beyond that to 2055" ... (Table 2: Examining authority's general questions arising from the draft Development Consent Order (DCO) (planninginspectorate.gov.uk))

That statement (3 September 2021) is consistent with what was assessed as part of the Environmental Impact Assessment, reported in the Environmental Statement, that supported the application for development consent (Book 6).

In September 2021, EDF's UK Nuclear Fleet Strategy stated that '*Extending power generation from Sizewell B by 20 years (to 2055) is now under active consideration, with a final decision due in 2024*' ([UK Nuclear Fleet Strategy Update - September 2021 | EDF \(edfenergy.com\)](#)). In the event that EDF makes a final decision to apply for an extension to Government, such an application would be subject to its own relevant assessments (including an environmental impact assessment) at that stage, which would have regard to the Sizewell C Project so far as it is relevant and appropriate.

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2. Please provide a copy of technical report TR217: Experimental studies to identify key chlorination by-products (CBPs) in cooling water discharge from Sizewell C Report (Version 1, June 2014).

As with previous technical report requests, a copy of TR217 is required formally as part of the SZC WDA application suite of supporting information, as it will be referenced within the operational WDA's HRA. Our specialists are aware of TR217 from the available suite of TRs in DCO/MTF space. Additionally, TR217 is referenced directly within the SZC operational WDA permit application via Appendix B (TR193 via sections 9.6 and 11.3) and Appendix D (WFD compliance assessment version 3, via reference 1.31).

TR217 is attached (the protective marking has been amended to be able to make this available).

I'm available to discuss today until 5:30pm, and for info I'm on annual leave tomorrow but back in on Monday if you need to discuss

All the best,

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Senior Permitting Officer: Nuclear New Build
National Permitting Service (Part of National Operations)

Environment Agency | Richard Fairclough House, Knutsford Road, Warrington, WA4 1HT

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External: █ | Internal: █

Mobile: █
Working days: Monday to Friday



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Registered in England and Wales No. 9284825
Registered Office: 90 Whitfield Street, London, W1T 4EZ