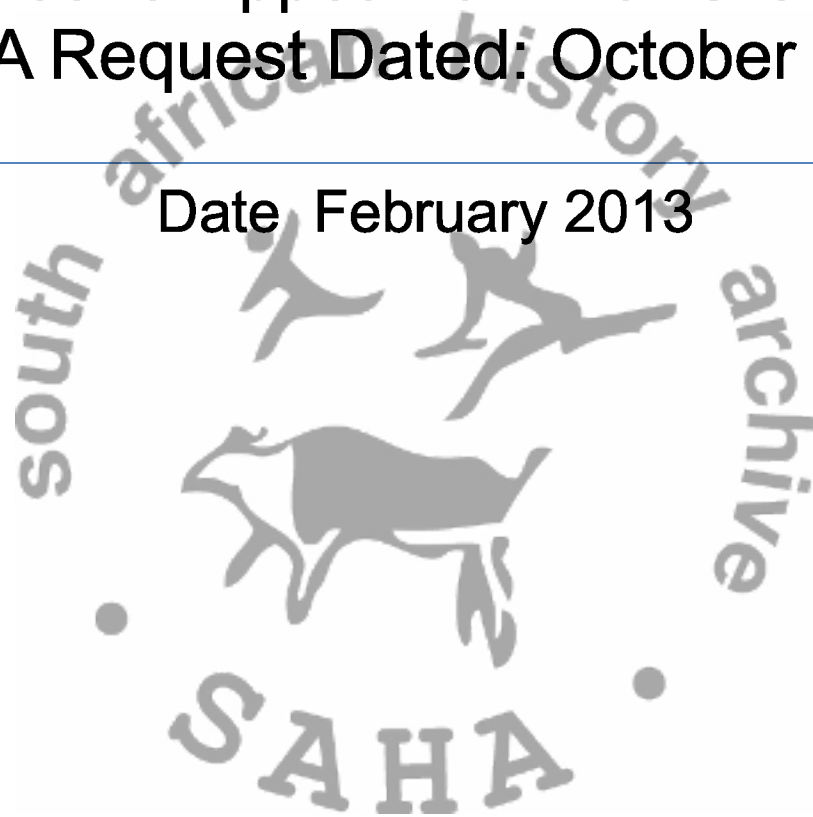


ESKOM

Response to Appeal to Initial Greenpeace PAIA Request Dated: October 2012

Date February 2013



Contents



1. Waste management: Any records relating to the management of nuclear spent fuel at the Koeberg nuclear site, including but not limited to:

1.1 Contingency plans in the event of a nuclear accident;

Eskom 1st response: *With used nuclear fuel, the concerns are cooling of the fuel, maintaining a sub-critical configuration and providing shielding against ionizing radiation. At Koeberg, a limited number of used fuel assemblies are stored in metal casks, whilst the majority is stored in the fuel pools.*

- *In the case of casks, cooling, sub-criticality and shielding is ensured through the design of the casks. Only fuel with low initial enrichment levels that was cooled for more than 10 years in the fuel pools, have been loaded into the casks.*
- *In the fuel pools, sub-criticality is maintained through design and by ensuring a minimum boron concentration in the fuel pool water. Cooling is ensured through heat exchangers, with additional equipment on standby, if needed. Shielding against radiation is provided by design and by the water covering the fuel.*

Appeal: We note the response given. However, we are of the view that this is not enough and we thus request documents from which this response was retrieved from.

Eskom 2nd response: *Eskom has answered the above question in a statement and details of the various contingency plans are considered restricted and hence will not be provided.*

1.2 The amount of spent fuel being generated;

Eskom 1st response: *Koeberg currently generates about 56 used fuel assemblies per unit, every 17 to 18 months.*

Appeal: We note the response given. However, we are of the view that this is not enough and we thus request documents from which this response was retrieved from.

Eskom 2nd response: *The details are officially publish in the Eskom Annual report: Please refer to the Eskom Annual report 2012 previously supplied or use link below*

http://financialresults.co.za/2012/eskom_ar2012/divisional-report/downloads/statistical-overview.xls

1.3 The amount of spent fuel being stored in pools

Eskom 1st response: *1901 Spent fuel assemblies are currently stored in the two fuel pools (unit 1 – 961 and unit 2 - 940).*

Appeal: We note the response given. However, we are of the view that this is not enough and we thus request documents from which this response was retrieved from.

Eskom 2nd response: *The details are officially publish in the Eskom Annual report: Please refer to the Eskom Annual report 2012 previously supplied or use link below*

http://financialresults.co.za/2012/eskom_ar2012/divisional-report/downloads/statistical-overview.xls

Note: Number previously provided includes fuel unloaded during the past year and hence will not be included in last year's annual report.

1.4 Any research, plans, or similar documents in relation to managing spent fuel by dry storage, rather than pools.

Eskom 1st response: Eskom embarked on a program to investigate and implement dry storage on Koeberg site until a centralized storage facility is available. It is however refused in terms of Section 44(2)(c) as it is a preliminary working document.

2 Plans, Offers, Research, Reports Relating To The Import Or Export Of Spent Fuel. Any records relating to the management of nuclear waste generated at the Koeberg nuclear site, including, but not limited to:

Eskom 1st response: To date no used fuel has been transported from the Koeberg site. Affidavit in this regard will be provided if required.

Appeal: Thank you for the response. However, we ask that you please provide affidavit.

Eskom 2nd response:

[See attached affidavit](#)

Greenpeace_Affidavit_Signed.pdf

Eskom 1st response : Offers to process the used fuel have been received; none of which have been accepted. The offers are considered commercially sensitive and cannot be disclosed (PAIA section 36(1)(c)).

Appeal: The request in this instance is for a record that relates substantially to plans and offers. Accordingly any commercial information contained in the record is secondary to the main purpose of the document and must be able to be severed.

The requestee is therefore required to sever the exempt information from the record for example by blacking out the commercial information and confidential information and release the remainder of the record to SAHA.

Eskom 2nd response: Currently Eskom has no plans to export used nuclear fuel for reprocessing. Hence no plans, research or report exist. Eskom does however have offers from vendors offering their services to reprocess Eskom's used nuclear fuel. These offers are considered commercially sensitive, as stated in first response, as these belong to the vendors they are considered to be third party information
General information on reprocessing is freely available on the internet.

2.1 **Budget for the transfer of waste to Vaalputs national radioactive waste disposal facility for the past 3 financial years;**

Eskom 1st response: To date no costs have been incurred for the transport of used fuel. The actual costs of transporting the low and intermediate level radioactive waste to Vaalputs is not provided as this considered confidential commercial information belonging to third parties.

Appeal: The request in this instance is for a record that relates substantially to plans and offers. Accordingly any commercial information contained in the record is secondary to the main purpose of the document and must be able to be severed.

The requestee is therefore required to sever the exempt information from the record for example by blacking out the commercial information and confidential information and release the remainder of the record to SAHA

Eskom 2nd response: The cost of transporting low level radioactive waste to the Vaalputs facility is treated as normal operating expense. Eskom reports its global operating expenses in its Annual Report and break down to individual contract is considered commercially sensitive as per our previous response