

APPENDIX D

OUTLINE ENVIRONMENTAL ACTION PLAN

D1. INTRODUCTION

This Appendix elaborates some sections of the outline EAP as a basis for subsequent discussion with the plant management and regulatory authorities.

D2.1 Environmental policy

Purpose

To include all relevant general conceptions applied to environmental matters at the NPP taking into account national and international policies where relevant.

To provide a delivery mechanism for addressing all adverse environmental impacts, enhance project benefits, and to introduce standards of good practice to be adopted for all project works including design, construction, commissioning, operation and decommissioning.

Content

It is anticipated that the statement of environmental policy will relate to policies of suppliers of equipment and services, and that it will include reference to environmental policies of project sponsors.

D2.2 Management responsibility for environmental affairs

Purpose

To identify (with organograms) all persons responsible for environmental matters at all levels within the NPP staff.

Content

It is anticipated that this will include organograms showing the various members of staff and indicating, for each identified member of staff, their respective responsibilities.

D2.3 Licenses

Purpose

To identify all laws, standards, authorisations etc. relating to environmental management of the NPP site and of its discharges.

Content

It is anticipated that this will take the form of a structured list of relevant documents (all of which will be retained by the NPP as hard copy or as readily-accessible electronic copy). It will include specific authorisations, limits on storage, utilisation, transport, disposal and discharge of materials likely to have an impact on the environment.

D2.4 Inspection

Purpose

To identify all regulatory inspections relevant to environmental protection, their timing, purpose, responsibilities for reporting and responsibilities for agreeing actions arising.

Content

It is anticipated that this will take the form of a structured table showing the timing and nature of all relevant inspections and providing a mechanism for demonstrating that the inspection has taken place, that an agreed record has been prepared, and that corrective actions (where appropriate) have been recorded along with a mechanism for discharging responsibilities. Where possible, checklists shall be agreed and developed with those undertaking inspections.

D2.5 Objectives and targets

Purpose

To define the present status and a programme of improvements along with objectives and targets.

Content

It is anticipated that this will take the form of a list of targets along with a programme for ensuring that they can be met. The targets will, wherever possible, be set in terms of distinct dates or project milestones and will include quantitative measures of achievement.

D2.6 Mitigation measures

Purpose

To list all potential impacts and, where appropriate, their potential mitigating measures. To prepare an environmental mitigation plan.

Content

This is anticipated to involve the drawing up of a table listing all potential impacts identified within the Environmental Impact Assessment along with the mitigating measures proposed (where appropriate) and the associated programme for implementation. Wherever possible, quantitative measures should be set to be able to define the extent to which the mitigating measure has been successful in achieving its objective.

D2.7 Monitoring

Purpose

To list all monitoring and control measures, including those which are required for statutory purposes and those which are required to meet the NPP environmental policy. To prepare an appropriate environmental monitoring plan.

Content

For each measure, a description of how it will be undertaken and who will be responsible for the various stages of implementation. To include sampling, sample preparation, analysis, intercalibration programmes, reporting, recording of results, quality assurance procedures, archiving, and, where appropriate, corrective actions.

D2.8 Records

Purpose

To provide a comprehensive system for maintaining all records relating to the EAP in a form suitable for external audit and review.

Content

It is anticipated that this will take the form of a structured system for filing all records relating to the EAP based on topic area, date etc.

D2.9 Environmental audit

Purpose

To define and implement a procedure allowing for internal audit of the environmental management plan against stated targets, objectives and procedures.

Content

It is anticipated that this will take the form of regular internal audits of the EAP by a person or persons nominated by management. Each audit will be recorded in full with the audit report open for inspection by external auditors. Any non-compliance will be recorded along with an agreed method and timescale for corrective action.

D2.10 Reporting

Purpose

To define methods and frequency for preparing reports for management, regulatory authorities and the public.

Content

It is anticipated that this requirement will cover both statutory reporting of environmental performance and that which is considered, within the Environmental Policy, to be good practice. The standard content of reports for different purposes will be defined along with a mechanism for ensuring that the necessary reports are completed according to agreed timescales.

D2.11 Liaison

Purpose

To set out the methods for liaison with the local community, the public at large, local, regional and central Government, and NGOs.

Content

It is anticipated that this will require the formation and support of a local liaison committee which can meet according to an agreed timescale to review development and implementation of the EAP and the NPP environmental performance. A procedure will be put in place to allow for definition of the composition of the committee, to ensure that meetings of this liaison committee are formally minuted, and that the minutes are distributed to other parties that have recorded an interest.

D2.12 Environmental training/awareness

Purpose

To ensure that all NPP staff are fully aware of the NPP Environmental Policy and EAP.

Content

It is anticipated that this will be achieved by a regular series of training courses and workshops involving staff at different grades and different responsibility. These training courses and workshops should not simply be designed to ensure that staff adhere to the set policy but to encourage them to assist with its development.

D2.13 Decommissioning plans

Purpose

To ensure that environmental issues are incorporated into decommissioning plans at an early stage.

Content

It is anticipated that this will ensure that environmental issues are addressed at the earliest possible stage whilst developing plans for decommissioning. Issues to be considered will include assessment of the wastes arising, the environmental impacts occurring during decommissioning, the criteria that will be applied for site clearance, and utilisation of the site after clearance.

D2.14 Emergency plans

Purpose

To document emergency plans.

Content

It is anticipated that this will represent a complete collection of all emergency plans along with responsibilities, interrelationships, communication channels, and provisions for implementation at different stages. It will also identify environmental impacts that may need to be considered during an emergency, intervention levels, and measures that will be taken to mitigate the effects of any impacts.

D2.15 Procedures

Purpose

To define, in the form of working procedures, all aspects of the EAP and its administration.

Content

It is anticipated that this will involve the definition and testing of procedures that can be used to ensure that the EAP is implemented in practice.

D2.16 Documentation

Purpose

To ensure that all material related to the EAP, including the agreed procedures, are documented.

Content

It is anticipated that this will take the form of a manual available to all members of staff of the NPP and endorsed by management against which both internal and external audits can be undertaken. It may also include the preparation of other materials for distribution outside the NPP to interested parties.

D2.17 Verification and compliance

Purpose

To define and document the procedure for ensuring that all aspects of the EAP are complied with by NPP staff and that such compliance can be verified by internal and external audit.

Content

It is anticipated that this item will define the mechanism for ensuring compliance and for recording such compliance or non-compliance in a fully traceable manner. It will need to be developed in conjunction with items D2.4 and D2.9 (above).

D2.18 Special conditions

Purpose

To list all conditions that have been identified in the EIA and which will be attended to during the preparation and implementation of the EAP.

Content

It is anticipated that these conditions will include but not be limited to the following topics.

- Completion of an assessment of water use by the NPP and of the impacts of such use.
- Implementation of a detailed ALARA practice on operational procedures at the NPP so as to minimise occupational exposures and discharges of radioactivity to the environment.
- Revised assessments of the radiological consequences of discharges of radioactivity to the cooling reservoir.
- Completion of an assessment of the socio-economic factors associated with the project including the development of mechanisms and procedures to ensure that any socio-economic impacts are optimised.
- Specification of the detailed arrangements for compensation for discharge of effluents and disposal of wastes.
- Updating and completion of assessments of the consequences of beyond design basis accidents.