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Kansai Electric's Takahama Units 3 and 4 Restart Review Enters Public Comment Period

First Use of Plutonium (MOX) Fuel Since Fukushima Accident Moves Ahead Without NRA Review of its Severe Accident Implications

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Japan's Nuclear Regulation Authority (NRA) today approved the first stage of the review for restart of Kansai Electric's Takahama Units 3 and 4 located in Fukui Prefecture. If restart is approved, it will be the first reactors to use plutonium (uranium and plutonium mlxed oxide fuel: MOX fuel) since the Fukushima accident.

The Nuclear Regulatory Agency stated today that the approval process for MOX fuel at Takahama had already been completed (before the Fukushima accident) and therefore its use will not come under NRA review. Compared to conventional uranium fuel, MOX fuel lowers the safety margin of reactor operation and causes greater health damage if released to the environment. Since there is no plan for spent MOX fuel, it will remain at the reactor site.

"It is unconscionable that the NRA is not undertaking a safety assessment of MOX fuel use. If the NRA is requiring stricter standards after Fukushima, a reassessment of MOX fuel use must be undertaken. Without this, the NRA has not learnt the lessons of Fukushima, nor can Japan profess that its regulatory safety standards are "'the strictest in the world' " said Aileen Mioko Smith, executive director of Green Action based in Kyoto.

The Takahama reactors are unique not only because they are slated to be the first to use MOX fuel since the Fukushima accident, but because they are located quite close to large populations. The center of Kyoto City is located 60 kilometers from the Takahama plant. The population of Kyoto Prefecture within the 30km nuclear accident evacuation area is 128,500 compared to Fukui Prefecture's 66,900 where the Takahama site is located. The entire cities of Maizuru (89,000) and Miyazu (20,300) in northern Kyoto must flee in case of a serious accident including their city hall administrations. The cultural heritage of Kyoto City is also endangered as well as Kyoto's tourism industry which suffered economic loss after the Fukushima accident. There are 15 nuclear reactors within a 52-kilometer radius of Kyoto City's northern city limits.

The NRA, however, refuses to address the holding of public hearing on the Takahama plant restarts in Kyoto Prefecture and states that the prefecture should go and ask Fukui if it wants to hold such meetings.

Current emergency plans to cope with an serious accident at the Takahama site are woefully inadequate including no effective plans for people with special needs, nor a decision as to where people will evacuate to within Kyoto Prefecture (Kyoto City is to accept 65,000 evacuees), and 31% of the evacuation points for Fukui and Kyoto citizens in Hyogo

¹ 3 March 2006, "Response to Saga Prefecture's Determination of the Safety of Pluthermal Use", Dr. Edwin S. Lyman, Senior Staff Scientist, Union of Concerned Scientists

Prefecture do not meet legal requirements.² Lake Biwa, the water serving the 14 million people of the Kansai area will be contaminated according to a study undertaken by Shiga Prefecture this year.³

The NRA approval process does not include whether evacuation plans are in place to protect citizens.

Kyoto Prefecture has sought to sign a nuclear safety agreement with Kansai Electric since June 2011, but has received no positive response.

Kansai Electric's fleet of reactors is aging, with 3 reactors over 40 years old and 4 others approaching 40 years. Although Kepco reported financial results in the black this year and there is sufficient electricity in the utility's area, the company is pushing to restart reactors.

A public comment process will be undertaken of the NRA draft review approval. The deadline is January 16, 2015. After that Kansai Electric must receive approval for its Construction Plan and Operational Safety Program before it can restart the reactors.

There is citizen protest against restart of the Fukui Prefecture reactors. Fukui Prefecture citizens are petitioning to stop restart of all the nuclear reactors and Kansai area residents are addressing evacuation, seismic, severe accident and other issues.

² 1 December 2014, 避難所が危険区域にあるか」のアンケート回答集計 http://www.greenaction-japan.org/modules/wordpress/index.php?p=725

nttp://www.greenaction-japan.org/modules/wordpress/index.pnp?p=/ ³ 21 January 2014, 放射性物質の琵琶湖への影響予測について

http://www.pref.shiga.lg.jp/bousai/gensiryoku/131118_biwakosimyure-syonn.html