GREEN ACTION

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Lessons of the Fukushima Nuclear Power Plant Have Not Been Learned

We Strongly Oppose the Restart of the Takahama Nuclear Power Plant Unit 3 Located in the Seismically Active Wakasa Bay Region of Japan

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There are fifteen nuclear reactors located in the Wakasa Bay region of Fukui prefecture, one of the most seismically active areas among nuclear power plant sites in this earthquake-ridden archipelago of Japan.

Takahama Unit 3 is being allowed to restart by Japan's Nuclear Regulation Authority (NRA) even though it does not meet NRA stardards for evaluating seismic motion, whereby the *variations* from the average recorded earthquake motions of past earthquakes must be taken into consideration. The plant is not safe from earthquakes.

The NRA also approved the plant's restart even though Kansai Electric, the owner operator, does not have plans for constructing a seismic isolation building which would act as a control center in the event of a serious accident involving an earthquake. Such a building existed at Fukushima Daiichi and is considered by Tepco to have been the lifeline for not worsening the accident.

Clearly, the lessons of the March 11, 2011's Fukushima Daiichi accident have not been learned by the regulator and Kansai Electric.

Kenichi Oshima of Ritsumeikan University rightly points out that Kansai Electric will only break even if four reactors at Takahama and Ohi all operate with regularity. Electric prices will only come down if the very old Takahama Units 1 and 2 are allowed to operate. In other words, restarting Takahama Units 3 and 4 will actually only increase electricity rates.

On 21 January, a coalition of NGOs including Green Action met with NRA officials who confirmed that only spot checks had been undertaken to confirm regulatory compliance of Takahama Unit 3 electric cabling. This means the NRA does not know if there is adequate separation between the cables needed for back-up systems and other cables, a vital requirement for meeting the fire code. Only Takahama Units 3 and 4 and the already-operating two Sendai reactors are exempt from undertaking comprehensive examinations of the electric cables. No valid explanation has been given by the NRA on why these four reactors are exempt. Lack of compliance could lead to a catastrophic accident.

Freedom of information disclosure has revealed that MOX (mixed plutonium uranium oxide) fuel to be used at Takahama Unit 3 (and subsequently other nuclear power plants) is of markedly inferior quality compared to uranium fuel normally used in reactors. The NRA has not re-assessed the MOX fuel standards created by the now-defunct NISA (the former regulator) which were created before the Fukushima Daiichi accident. MOX fuel is known to be less safe than uranium fuel. Here again, neiher the NRA nor the utilities have learned the lessons of Fukushima.

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Nearly 180,000 people must evacuate from Fukui and Kyoto prefectures in the event of a serious accident at the Takahama plant. Small children near the plant remain unprotected. Their parents must battle through congested traffic just to get potassium iodine pills. Green Action as part of a coalition of citizens in the Kansai region has made over 60 visits to cities evacuating and others which are evacuation points. We have learned there is no viable evacuation plan in place for the tens of thousands of people with special needs--inpatients and outpatient at hospitals and various facilities, those in day care, and those with handicaps living at home. When others can flee, there are no vehicles to transport these people nor medical care prepared if and when they reach the evacuation facilities. Restart of the Takahama plant is a human rights injustice toward children and those with handicaps.

As for evacuation drills, Kansai Electric confirmed back in 2014 that Fukui Prefecture asked for the accident scenario to be sent from the utility to be for a small enough accident so the prefecture's evacuation drills could cope. All drills in the Fukui and northern Kyoto Prefecture region have been grossly inadequate. There is no consideration that there could be heavy snow or an earthquake.

The government and Kansai Electric has ignored repeated calls by the 8 prefectures and 4 cities of the Union of Kansai Governments which state since they are in the region that can be affected by a serious accident, therefore they should have consent rights when it comes to reactor restart issues.

"Restart of Takahama violates the NRA seismic safety standard. Operating a Japanese reactor without a seismic isolation emergency control room is negligence in the extreme. Tens of thousands of children including babies and those with special needs not being protected under current emergency management planning is an outright human rights violation." said Aileen Mioko Smith, executive director of Green Action based in Kyoto.