



To: [justification@decc.gsi.gov.uk](mailto:justification@decc.gsi.gov.uk)

15 February 2010

[www.nuleaf.org.uk](http://www.nuleaf.org.uk)

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Dear Owen Jenkins,

### **Comments on the Radioactive Waste Elements of the Proposed Justification Decision Documents**

I write on behalf of NuLeAF, which is a Special Interest Group of the Local Government Association that seeks to represent the views of its member local authorities on nuclear legacy management issues and developments that may impact upon that management. Further information on NuLeAF can be found at [www.nuleaf.org.uk](http://www.nuleaf.org.uk).

As an organisation, NuLeAF is neither pro nor anti nuclear. However, it does have considerable collective understanding and experience of radioactive waste management developments. This has been drawn on in preparation of the comments below. These comments were prepared following discussion at NuLeAF's Strategy Review Group and have been approved by its Steering Group, which consists of councillors and officers from NuLeAF's leading member local authorities.

In December 2008 the Government started a consultation on the Application from the Nuclear Industry Association (NIA) for a Regulatory Justification decision in relation to new reactor designs. NuLeAF's comments on the Application focused on three issues associated with radioactive waste management and decommissioning:

- The lack of consideration in the application of the implications of the potential use of Mixed Oxide (MOX) fuel in new nuclear power stations
- The need to consider the detriments associated with the potential need for a second Geological Disposal Facility (GDF) for new build spent fuel
- The need to consider the capacity and status issues at the LLW repository and the problematic nature of siting new LLW disposal facilities, or increasing the use of off-site facilities.

Special Interest Group on Nuclear Decommissioning and Radioactive Waste Management

Chapter 4 of the proposed decision documents sets out what Government considers to be the evidence on the potential detriment arising from waste and decommissioning aspects. It also sets out the Secretary of State's current views based on that evidence. This is that there is a potential health detriment from the management and disposal of radioactive waste arising from any new nuclear power station built in the UK, but that "the risk of health detriment from such radioactive waste is very small and will remain very small up to and beyond disposal" (Vol 2, para 4.157). The chapter then poses the questions: do you agree or disagree with these views, and are there any matters relevant to the potential detriment that have not been considered?

A review of the proposed decision documents indicates that Government has taken account of some but not all of the issues raised by NuLeAF during the earlier consultation. In particular, the proposed decision documents:

- Do not consider the implications of the potential use of MOX fuel. For example, the Government assessment of the disposability of spent fuel from new reactors focuses only on oxide fuel (Vol 2, para 4.38).
- Acknowledge the potential need for a second GDF, but do not explicitly consider any potential additional detriments that this might cause (Vol 2, para 4.80).
- Contain a more up-to-date account of LLW management (compared to the original NIA application), but does not acknowledge the difficulties likely to be encountered in implementation of LLW strategy (Vol 2, paras 4.111-4.119).

NuLeAF suggests that these points be addressed by Government to ensure full consideration of the potential detriments that may be associated with radioactive waste management issues.

I hope that these comments are of value.

Yours sincerely,

Fred Barker

Fred Barker  
Executive Director