

E-BULLETIN

February 2010,
Issue 17



Welcome to Issue 17 of the e-bulletin, which contains news about:

- NuLeAF's response to the draft Nuclear National Policy Statement and proposed justification decision on new nuclear stations
- consultation on the Scottish Government's proposed policy for managing higher activity wastes
- the process for siting a Geological Disposal Facility
- the Submarine Dismantling Project
- developments in Low Level Waste Management
- NDA developments and
- dates for the diary.

Response to the Draft Nuclear National Policy Statement (NPS) and Proposed Justification Decision on New Nuclear Stations

The Government has published a series of draft NPSs on energy infrastructure with a deadline for comment of 22 February. Subject to the consultation and Parliamentary scrutiny, the Government intends to formally approve the NPSs in 2010.

The primary purpose of the consultation is to ask whether the NPSs are fit for purpose: in other words, whether they provide a suitable framework for the Infrastructure Planning Commission (IPC) to make decisions on applications for development consent for energy infrastructure projects. The draft Nuclear NPS also seeks views on the Government's assessment of arrangements to manage and dispose of radioactive wastes.

A parallel consultation is being undertaken on the Secretary of State's proposed decision on the Regulatory Justification of new nuclear power station designs (the AP1000 and EPR). This involves a decision about whether a new class or type of practice resulting in exposure to ionising radiation is justified by its economic, social or other benefits in relation to the health detriment it may cause.

At its meeting on 27 January, the NuLeAF Steering Group (SG) considered a detailed report on the two consultations. This is available on the NuLeAF website at [SG 27 Jan item 4](#). The report discusses a range of questions about the radioactive waste management aspects of the draft Nuclear NPS and associated documents.

Following discussion, the SG agreed:

- 1 To submit a response to consultation on the draft Nuclear NPS (note that the draft response attached to SG 27 Jan item 4 as Annex B will be subject to some minor drafting changes prior to submission).

- 2 To submit the response to the consultation on the proposed justification decision (as attached to the item 4 report at Annex C).
- 3 To write to member local authorities in areas with proposed sites to draw their attention to the radioactive waste management issues that could be addressed in Local Impact Reports and to offer a meeting to discuss these issues.
- 4 To write to the West Cumbria MRWS Partnership to draw its attention to the issues most relevant to the siting of a Geological Disposal Facility.
- 5 To ask the secretariat to monitor those aspects of the Generic Design Assessment process that deal with the assessment of the quantities and types of waste that are likely to arise, their suitability for storage, transport and their disposability.

Consultation on the Scottish Government's Proposed Policy for Managing Higher Activity Wastes

The Scottish Government has launched a consultation on its proposals for managing Higher Activity Wastes (HAW). This was launched on 18 January and closes on 9 April. The Consultation Document (CD) and associated Environment Report (ER) are available on the consultation section of the Scottish Government's website ([Scotland's Higher Activity Radioactive Waste Policy: Consultation 2010](#)).

In summary, the proposed policy is to:

support long-term near surface, near site storage and disposal facilities so that the waste is monitorable and retrievable and the need for transporting it over long distances is minimal.

The CD explains that the proposed policy has been extended to include near surface, near site disposal as well as storage. It adds that near surface disposal is the preferred option, and that storage should be pursued where this is not possible.

Although the proposed policy is for wastes arising in Scotland, the NuLeAF SG agreed that it is important to comment where that policy may (a) have direct impacts upon waste management in England and Wales or (b) set precedents for strategies for managing wastes in England and Wales.

Following discussion, the SG agreed to comment on the following issues:

- lack of explanation for rejection of Geological Disposal
- the position on Vitrified High Level Waste (VHLW) from reprocessing spent fuel from nuclear power stations in Scotland
- the amount of Intermediate Level Waste that may be suitable for near surface disposal
- the need for public debate on siting strategies
- omission of socio-economic effects from Environmental Assessment

Preliminary comments on these issues are set out in a report to the SG at [SG 27 Jan addendum to item 8](#). The SG's response will be finalised and published on the NuLeAF website before the end of February.

Siting a Geological Disposal Facility (GDF)

The West Cumbria MRWS Partnership met on 13 January and discussed the regulatory processes that apply to GDF siting, and the meaning and implications of reversibility and retrievability.

The Partnership has started producing a newsletter. The January issue focuses on progress with its first round of public and stakeholder engagement and is available on the Partnership website at westcumbriamrws. A case study on the early work of the Partnership has also been published on the NuLeAF website ([Case Study 9](#)).

An update on other aspects of the GDF siting programme is available in a progress report to the NuLeAF SG (see section 1 in [SG 27 Jan item 8](#)).

The Submarine Dismantling Project (SDP)

The Executive Director (ED) attended a meeting of the SDP Steering Group on 5 November, where it was reported that there were delays to the project arising from: (a) the length of time needed to identify all credible potential sites for dismantling and/or storage of the submarine wastes and (b) a Ministerial decision that briefings for elected representatives should be organised in areas with potential sites.

It is understood that the SDP programme is currently under review within the Ministry of Defence (MoD), with the possibility that formal public consultation will not start until late 2010 or early 2011. In the meantime, MoD is seeking to proceed with the briefings for elected representatives in the 12 areas that it has identified as potential sites. MoD has written to elected representatives in 7 areas (thought to be MoD or commercial sites) and is seeking inter-departmental agreement to write to elected representatives in the remaining 5 areas (thought to be NDA sites).

Briefings have taken place in 2-3 areas, including Plymouth where Devonport is a potential dismantling and storage site (see [Western Morning News](#)).

The ED has joined the Consultation Sub-Group of the Project's Advisory Group which will develop advice on how to move forward on pre-consultation engagement with stakeholders (including potential local authority involvement in assessment workshops) and on formal public consultation.

At its meeting on 27 January, the SG agreed to offer to liaise with and brief member local authorities that may become involved in the SDP programme (see [SG 27 Jan item 5](#)).

Developments in Low Level Waste (LLW) Management

The meeting of the SG on 27 January received an update about secretariat initiatives on LLW management ([SG 27 Jan item 6](#)). These include:

- **Overview of Proposed LLW Management Facilities:** Preparation and updating of a spreadsheet providing an overview of proposals for Clifton Marsh (Lancashire), Keele Head (Cumbria), King's Cliffe (Northamptonshire), Lillyhall (Cumbria) and Springfields (Lancashire). The spreadsheet lists: the type of site, the operator, the nature of the proposed facility, the permissioning process; the current position and anticipated decision dates; public and local authority views; sources and potential volumes of

waste; maximum activity levels; and further information. The spreadsheet is published on the NuLeAF website ([Overview of developments](#)) and will be updated and expanded as new information becomes available.

- **New LLW section on website:** This has been developed so that local authorities dealing with proposals for LLW management facilities can easily access relevant information ([LLW section](#)). It covers: Government policy; UK LLW strategy; regulation; planning and current developments.
- **Meeting with regional planners:** Following a presentation by the ED to a meeting of Chairs of Regional Technical Advisory Bodies, a follow-up meeting between NDA and regional planners is being organised for 5 March. This will review a regional breakdown of waste arisings and management facilities, and involve exploratory discussions about the implications for regional planning.

NDA Developments

A further report to the SG (see [SG 27 Jan item 7](#)) provided an update on NDA developments. These include:

- Involvement in the **Public Value Programme (PVP)**, which is a Treasury-led review of spending plans. NDA is going through a process of assessing options for moving forward, with the aim of recommending options to Ministers in the spring of 2010. The scope of the initial long-list includes: deferrals (what really does not need to be done now); deletions (what could be done differently); accelerations (what could be bought forward on value for money grounds); efficiencies; and income generation possibilities (what generating lives could be extended). A particular focus is on opportunities to reduce support and overhead costs. The long-list will be reduced to a short-list by assessing options against PVP criteria (which will draw on Value Framework criteria and others including affordability and impact on the supply chain).
- On 1 December, the NDA launched an eight week consultation on its **draft Business Plan for 2010-2013**. The draft plan is available at [Consultation Details](#). The comments attached as Annex B to SG report item 7 were submitted on the authority of the Chair and Vice-Chair. The main comments re-iterate the need for NDA to do more to explain the nature of its assessment processes and the basis for proposed spending plans. After the consultation, NDA intends to provide a summary of consultation responses and how these have been taken into account. The Business Plan will then be submitted to the Secretary of State and Scottish Ministers for approval by 31 March.
- The NDA's current Strategy document was published in March 2006 and reflects the environment at that time. Under the Energy Act 2004, the Strategy must be reviewed at least every five years. The NDA intends to consult on a revised Strategy during the latter half of 2010, with a view to publication in 2011. NDA has offered NuLeAF an opportunity for **pre-consultation discussion on its thinking about the revised strategy**. A presentation by NDA and discussion has therefore been scheduled for the afternoon session of the Steering Group meeting on 20 April.

Dates for the Diary

10 March	LLW Officer Working Group, New Academic Building, London School of Economics, Kingsway, London (12.30 – 3.30)
20 April	Steering Group, Local Government House, Smith Square, London (11.00 - 3.00)
14 July	Steering Group, Manchester, venue tbc (11.00 – 3.00)
20 October	Steering Group and AGM, Local Government House, Smith Square, London (11.00-3.00)

Contact Points

All member authorities are asked to ensure that NuLeAF is kept informed of any changes to officer or councillor contacts. It is important that these are kept up-to-date, so that the right people receive e-bulletins, invitations to NuLeAF meetings and other information.

NuLeAF can be contacted via the Secretariat c/o Suffolk County Council, Endeavour House, Russell Road, Ipswich IP1 2BX, Tel: 01473 264833 e-mail: catherine.draper@nuleaf.org.uk.