

STRATEGIC OBJECTIVES FOR 2010

Policy Statement 7 October 09



Background

NuLeAF adopted its first set of objectives at the AGM in 2008 (published as [PS5](#)). These have been subsequently reviewed, amended and expanded in light of current developments. Draft revised objectives were first discussed at the Strategy Review Group prior to submission and approval by the AGM in October 2009.

This Policy Statement contains:

- An overview of the objectives for 2010
- A tabular presentation of the review and development of objectives.

Each page of the table considers a different topic. These topics are:

- NDA strategy and operations
- Low Level Waste (LLW) strategy
- Geological Disposal Facility (GDF) siting
- Legacy management implications of potential new build
- Submarine Dismantling Project (formerly ISOLUS)
- Community funds and socio-economic support
- Local engagement arrangements

For each topic, the tabular review consists of the following columns:

- Issue as understood at the 2008 AGM
- Objective agreed at the AGM for 2009
- Subsequent actions and developments
- Comments relevant to the objective
- Proposed objective for 2010.

The style of font in the table indicates whether or not an objective has remained the same, been changed or added to: the standard font represents no change; italic text shows where a change has been made; and bold text indicates a new objective. Of the 21 objectives, 11 have remained the same, 5 amended and 5 are new.

Overview of Strategic Objectives for 2010

NDA Strategy and Operations

1. Encourage development of funding models for NDA, and specific radioactive waste management projects, that enable progress to be made in legacy management (dependent upon openness and transparency, effective engagement, robust regulation and due regard to the long term).
2. Encourage NDA to explain to stakeholders its assessment processes and decisions about: priorities for spending; project business cases; and its next funding bid to Government as part of the Comprehensive Spending Review.
3. Encourage regional approaches where they are supported by affected local authorities in light of the overall balance of benefits and disadvantages.
4. Seek to ensure that proposals for new projects that may be simpler, faster or cheaper than current practices can be convincingly demonstrated to be the best options, taking into account a full range of life cycle, safety, environmental and socio-economic factors, and stakeholder views.

Low Level Waste (LLW) Strategy

5. Seek to ensure that LLW strategy is implemented in ways that can inspire local authority and public confidence.
6. Encourage and assist the NDA, Site Licensee Companies (SLCs) and the supply chain to take full account of the role and needs of the local authority planning system in the implementation of LLW strategy.
7. Encourage Waste Planning Authorities to develop policy in Minerals and Waste Development Frameworks on the management of LLW (and VLLW).
8. Encourage regional bodies to develop policy in Regional Strategies on the management of radioactive wastes.
9. Subject to site suitability and local community views, encourage development of local or regional LLW management facilities at existing nuclear sites, rather than at non-nuclear sites

Geological Disposal Facility (GDF) Siting

10. Liaise effectively with any local authority that may wish to consider, or makes, an expression of interest in the GDF siting process and to provide assistance as appropriate.
11. Work with Government, the NDA, CoRWM, regulators and member authorities to help ensure that the approach based on voluntarism and partnership works successfully in practice.
12. Ensure member authorities are briefed and up-to-date on developments in the GDF siting process.

Legacy management implications of potential new build

13. If Government continues to encourage the building of new nuclear power stations, to seek to ensure that its National Policy Statement is open and transparent about the interactions between new nuclear build and nuclear legacy management.
14. Seek to ensure that proposals for radioactive waste management and decommissioning of new nuclear power stations do not prejudice effective management of the nuclear legacy.
15. If proposals for new nuclear build continue to move forward, to promote debate about the interactions with nuclear legacy management and the pros and cons of utilising these interactions to the benefit of nuclear legacy management. Any such use should be in accordance with the principle that the companies concerned meet the full cost of decommissioning and radioactive waste management liabilities that arise from new nuclear power stations. This debate should include how a more coordinated 'across site' approach could be taken in locations that have or are proposed to have multiple licensed nuclear sites.

Submarine Dismantling Project (formerly ISOLUS)

16. Encourage any member authority that may be affected by the management of the radioactive wastes from laid up nuclear submarines to participate in consultation on the proposed way forward.
17. Encourage MoD to adopt clear objectives and good practices in the consultation on options for managing radioactive wastes from the Submarine Dismantling Project.
18. Seek to ensure that the approach taken to the implementation of the Submarine Dismantling Project is consistent with developments in the civil nuclear industry.

Community funds and socio-economic support

19. Seek to ensure that a consistent, proportionate and transparent approach can be taken to the establishment of Community Funds associated with key radioactive waste management facilities.
20. To promote good practices in applications to NDA for socio-economic funding.

Local engagement arrangements

21. Encourage member authorities with licensed nuclear sites to ensure that effective engagement arrangements with SLCs and NDA are in place, either through the Site Stakeholder Group or direct engagement.

TOPIC	ISSUE [as at AGM 08]	OBJECTIVE FOR 09	ACTIONS AND DEVELOPMENTS	COMMENT	PROPOSED OBJECTIVE
NDA Strategy and Operations	Government review of NDA funding model underway. Indications that some Parent Body Organisations (PBOs) are prepared to develop commercial radwaste facilities on NDA land (offering a fee-based service to other sites/sectors).	1 Encourage development of funding models and <i>asset optimisation</i> to enable progress In legacy management (dependent upon openness and transparency, effective engagement, robust regulation and due regard to the long term)	Funding model review still underway (announcement expected before next Comprehensive Spending Review). No development of commercial facilities by PBOs, but discussion indicates some PBOs prepared to take on risks and part fund facilities.	Government and NDA under severe cost pressures. Cash from NDA land sales could fund some decom projects. Priorities being assessed (see 'value framework' below). Need to encourage innovative funding approaches where consistent with other objectives.	1 Encourage development of funding models <i>for NDA, and specific radioactive waste management projects</i> , that enable progress to be made in legacy management (dependent upon openness and transparency, effective engagement, robust regulation and due regard to the long term)
	Prioritisation of spend at high hazard sites. Examination of 'safe secure sites' ('mothballing') contingency at Magnox sites	2 Encourage <i>development of a robust, transparent and participative process for informing decisions about prioritisation of spending</i>	NDA has developed a set of tools (the 'Value Framework') to inform decisions about priorities and funding. More information is needed to generate confidence in the approach (SG April item 6 and July item 7). In response to NuLeAF requests, NDA to make presentation to SG/AGM and next NSG	Suggest change of emphasis to reflect need for NDA to demonstrate that the 'value framework' provides a robust input to NDA decision making in key areas. The key areas include: assessment of priorities for spending and business cases for specific projects, and preparation of the next NDA funding bid to Government as part of CSR.	2 Encourage <i>NDA to explain to stakeholders its assessment processes and decisions about: priorities for spending; project business cases; and its next funding bid to Government as part of CSR.</i>
	Potential for consolidation of facilities at a smaller number of nuclear sites	3 Encourage regional approaches where they are supported by affected LAs in light of overall balance of benefits and disadvantages	The NDA review of ILW storage indicated that consolidation would be further reviewed (SG April item 7). The NDA NSG in June discussed the pros and cons of consolidation of treatment and storage, and how to overcome barriers. The outputs are to inform development of a NDA 'topic strategy paper'. Note that the July SG heard that inter-site transfers are not a critical enabler for emerging Magnox strategy. See also LLW Strategy below.	This issue has been rumbling away for several years without coming to a head, probably because the potential cost savings do not provide enough incentive to counter concerns about local political opposition to 'waste imports' and resultant demands for community benefits. Some ILW stores would also require changes to planning conditions to allow consolidation. It is not clear whether the issue will re-emerge in 2010. See also discussion under LLW Strategy, new nuclear build and Community Funds.	3 Encourage regional approaches where they are supported by affected LAs in light of overall balance of benefits and disadvantages.
	-NA-	-NA-	The drive to reduce costs, and find ways of moving forward at lower hazard sites, is leading NDA and industry to adopt or assess "simpler, faster and cheaper" projects. Examples include: the use of off-site landfill for VLLW; the possible use of alternative disposal concepts for some ILW (SG July item 5); and the use of 'mini-stores' for ILW.	In order to inspire local authority and public confidence, there is a need for convincing demonstrations that such projects are the best practicable, taking into account a full range of safety, environmental and socio-economic factors, and stakeholder views. An appropriate form of strategic objective is required.	4 Seek to ensure that proposals for new projects that may be simpler, faster or cheaper than current practices can be convincingly demonstrated to be the best options, taking into account a full range of life cycle, safety, environmental and socio-economic factors, and stakeholder views.

TOPIC	ISSUE [as at 08 AGM]	OBJECTIVE FOR 09	ACTIONS AND DEVELOPMENTS	COMMENT	PROPOSED OBJECTIVE
LLW Strategy	<p>Involvement in NDA LLW Strategy review. NDA emphasis on: optimising use of LLWR; implementing the WMH; identifying diversified approaches; and supporting proposals for disposal at or near some NDA sites.</p> <p>Submission of interim comments re need to address how to: (a) build local community confidence in proposals; (b) take account of role and needs of LA planning system.</p>	4 Seek to ensure that LLW strategy is <i>developed and</i> implemented in ways that can inspire local authority and public confidence	Point stressed to NDA and appropriate text now included in proposed strategy. Policy statement on decision-making and engagement published (SG April Item 3). Paper on 'good practice' prepared for NDA strategy group (being discussed 8/9/09).	Implementing the commitments to engagement/public acceptability will be a challenge. NuLeAF should promote and be supportive of good practices. The focus in the objective should be on implementation.	5 Seek to ensure that LLW strategy is implemented in ways that can inspire local authority and public confidence
		5 Encourage and assist the NDA to take full account of the role and needs of the LA planning system <i>in the development</i> and implementation of LLW strategy	Proposed strategy currently weak in this area. Points for inclusion identified through seminars and LLWOWG, and included in comments on proposed LLW Strategy (SG July item 4). Telephone conference with NDA resulted in their request to us to submit some draft text. Draft text was considered by LLW OWG on 10/9/09 and has been submitted to NDA.	Progress is being made through discussion with NDA. Objective still appropriate, but focus will need to be on implementation, and on SLCs and the supply chain as well as NDA.	6 Encourage and assist the NDA, <i>SLCs and the supply chain</i> to take full account of the role and needs of the LA planning system in the implementation of LLW strategy
		6 Encourage WPAs to develop policy in MWDFs on the management of LLW (and VLLW)	Numerous initiatives taken, including publication of Case Studies and LG press articles, discussion in seminars, briefing of LGA and presentation to POS. Issue highlighted in Inspector examination of Cumbria CC MWDF and in discussion between Cumbria CC and Govt.	Progress is being made, particularly by WPAs involved in NuLeAF's LLW Officer WG. Further progress can be made by promoting good practice and providing opportunities for discussion. Issue now potentially relevant to all WPAs in light of use of off-site facilities and impending strategy for non-nuclear industry. Objective still relevant and appropriate.	7 Encourage WPAs to develop policy in MWDFs on the management of LLW (and VLLW).
		-NA-	Work also initiated on coverage of radwaste in regional plans and meeting with RTAB Chairs anticipated (SG July item 10).	Therefore suggest appropriate objective re regional planning	8 Encourage regional bodies to develop policy in Regional Strategies on the management of radioactive wastes.
		7 <i>In context of the waste management hierarchy and suitability of site</i> , encourage development of local or regional LLW management facilities at existing nuclear sites, rather than at non-nuclear sites	Point stressed in discussions with NDA. Proposed strategy no longer promotes off-site facilities in preference to on-site, and highlights importance of local option assessments (SG July item 4). NuLeAF response proposes that where necessary NDA should give more consideration to the regional level, and that early discussion with WPA and regional planners should ensure facilities do not become 'regional facilities' by default.	Subject to site suitability and local community views, NuLeAF's overall preference is for concentration of facilities at or adjacent to existing nuclear sites. Option assessments are needed to identify preferred approaches locally, taking into account local community views and the proximity principle. Note, however, that for most sites a robust business case for on/adjacent site facilities can probably only be made if it is proposed to also take wastes from neighbouring sites or from elsewhere in the region (Sellafield and Dounreay excepted). Also, some WPAs may wish to prevent off-site facilities (eg landfill) becoming regional facilities and look to the use of planning conditions or agreements to achieve this (SG July Item 4). LINKS TO NEW BUILD AND COMMUNITY FUNDS.	9 <i>Subject to site suitability and local community views</i> , encourage development of local or regional LLW management facilities at existing nuclear sites, rather than at non-nuclear sites

TOPIC	ISSUE [as at 08 AGM]	OBJECTIVE FOR 09	ACTIONS DEVELOPMENTS AND	COMMENT	PROPOSED OBJECTIVE
GDF Siting	Siting process launched. Expressions of Interest from Copeland BC, Allerdale BC and Cumbria CC. Some discussion in other areas, but no EoIs. EoI process open for foreseeable future.	8 Liaise effectively with any LA that may wish to consider, or makes, an expression of interest in GDF siting process and to provide assistance as appropriate.	Participating in West Cumbria MRWS Partnership and assisting with formulation of PSE programme and risk register. No further interest from LAs from other areas, but Government writing out again (in September).	Continued progress in West Cumbria possible, with steps taken towards resolution of decision-making framework and processes between boroughs and county. Anticipate providing continued assistance through participation in the Partnership. Will respond to any request for advice or assistance from other areas. Objective still relevant and appropriate.	10 Liaise effectively with any LA that may wish to consider, or makes, an expression of interest in GDF siting process and to provide assistance as appropriate.
		9 Work with Government, the NDA, CoRWM, regulators and member authorities to help ensure that the approach based on voluntarism and partnership works successfully in practice.	Liaison meetings with Govt and NDA being held once very three months. Participating in Regulatory Interface Management meetings. Liaising with CoRWM, which is producing a position paper on Govt/NDA engagement with EoI communities (planned for Feb 2010). Raising issues as appropriate in accordance with objective. Contributing to/participating in international initiatives (COWAM in Practice and CARL workshop)	There is a continued need to input as outlined. Forthcoming issues flagged in CoRWM's draft R&D report eg whether there is a need for a separate underground R&D stage, and re-visiting of the issue of retrievability. Objective still relevant and appropriate.	11 Work with Government, the NDA, CoRWM, regulators and member authorities to help ensure that the approach based on voluntarism and partnership works successfully in practice.
		10 Ensure member authorities are briefed and up-to-date on developments in the GDF siting process.	Progress reported regularly to SG and in e-bulletin (SG Feb item 8, April item 7 and July item 10). Articles published in LG media.	Objective still relevant and appropriate.	12 Ensure member authorities are briefed and up-to-date on developments in the GDF siting process.

TOPIC	ISSUE [as at 08 AGM]	OBJECTIVE FOR 09	ACTIONS AND DEVELOPMENTS	COMMENT	PROPOSED OBJECTIVE
Legacy Management Implications of Potential New Build	<p>NuLeAF's remit allows it to consider the implications of potential new build for legacy management.</p> <p>In BP9, NuLeAF argued for greater clarity about the interactions.</p>	11 If Government continues to encourage the building of new nuclear power stations, to seek to ensure that its National Policy Statement is open and transparent about the interactions between new nuclear build and nuclear legacy management.	Draft NPS not yet published. Now anticipated in autumn 09 (see the Government's 'Road to 2010', para 3.9).	Objective still relevant and appropriate	13 If Government continues to encourage the building of new nuclear power stations, to seek to ensure that its National Policy Statement is open and transparent about the interactions between new nuclear build and nuclear legacy management.
		12 Seek to ensure that proposals for radioactive waste management and decommissioning of new nuclear power stations do not prejudice effective management of the nuclear legacy	A number of initiatives taken: response to Govt discussion paper on funding decommissioning of new build; response to NIA application for justification of new build; and publication of background briefing on interactions (all SG Feb item 7). Also liaising with LGA officer-led technical group (SG April item 7). CoRWM is producing a position paper on new build wastes (planned for Spring 2010).	Objective still relevant and appropriate	14 Seek to ensure that proposals for radioactive waste management and decommissioning of new nuclear power stations do not prejudice effective management of the nuclear legacy
		-NA-	<p>NuLeAF seminar in Dec 08 raised issue of exploitation of synergies to advantage of nuclear legacy management (SG Feb item 6).</p> <p>Presentation and discussion at SRG, 23 September (see SG report 15 Oct item 7)</p>	Without seeking to encourage new nuclear build, there is a need for public discussion and debate about the extent to which, and ways in which, it might be appropriate to exploit the synergies to the advantage of nuclear legacy management.	15 If proposals for new nuclear build continue to move forward, to promote debate about the interactions with nuclear legacy management and the pros and cons of utilising these interactions to the benefit of nuclear legacy management. Any such use should be in accordance with the principle that the companies concerned meet the full cost of decommissioning and radioactive waste management liabilities that arise from new nuclear power stations. This debate should include how a more co-ordinated 'across site' approach could be taken in locations that have or are proposed to have multiple licensed nuclear sites.

TOPIC	ISSUE [at 08 AGM]	OBJECTIVE FOR 09	ACTIONS AND DEVELOPMENTS	COMMENT	PROPOSED OBJECTIVE
Submarine Dismantling Project (formerly ISOLUS)	Consultation on a proposed way forward was scheduled for 2009	13 Encourage any member authority that may be affected by the management of the radioactive wastes from laid up nuclear submarines to participate in consultation on the proposed way forward	The consultation is not now anticipated until the Spring of 2010. The consultation is linked to an SEA which will name potential sites for cut-up and/or storage.	The consultation is likely to raise issues around 'waste imports' to an existing licensed nuclear site (and therefore 'community benefit' packages). See also 3 rd row comment under NDA strategy and operations. Objective still relevant and appropriate	16 Encourage any member authority that may be affected by the management of the radioactive wastes from laid up nuclear submarines to participate in consultation on the proposed way forward
		-NA-	We are liaising with MoD re setting up a pre-consultation briefing for affected LAs (SG July item 6).	There should be opportunity for NuLeAF (and affected authorities) to influence the form of consultation, through the next meeting of the SDP Steering Group (5 November) and the pre-consultation briefing.	17 Encourage MoD to adopt clear objectives and good practices in the consultation on options for managing radioactive wastes from the Submarine Dismantling Project
		14 Seek to ensure that the approach taken to the implementation of the ISOLUS Project is consistent with developments in the civil nuclear industry	MoD is liaising with NDA who are examining the potential use of sites within their estate.	Objective still relevant and appropriate	18 Seek to ensure that the approach taken to the implementation of the Submarine Dismantling Project is consistent with developments in the civil nuclear industry

TOPIC	ISSUE [at 08 AGM]	OBJECTIVE FOR 09	ACTIONS AND DEVELOPMENTS	COMMENT	PROPOSED OBJECTIVE
Community Funds and Socio Economic Support	Discussions taking place with NDA and Government about the case for establishing a framework for community funds associated with radwaste facilities	15 Seek to ensure that a consistent, proportionate and transparent approach can be taken to the establishment of Community Funds associated with key radioactive waste management facilities.	Paper produced for discussion with Govt, but officials not persuaded to adopt a framework (SG Feb item 5). Reliance to be placed on s106 agreements, on a case by case basis. Note Government consultation on Community Infrastructure Levy (CIL) (to be reported to Oct SG, item 6). Production of Briefing Paper (April SG item 4) and Case Studies (LLWR and Dounreay) to ensure understanding and awareness of s106 approach and existing examples. Updated Briefing Paper likely to be needed to take account of CIL.	Objective still relevant and appropriate and can be pursued by publication of information and advice about existing and future cases.	19 Seek to ensure that a consistent, proportionate and transparent approach can be taken to the establishment of Community Funds associated with key radioactive waste management facilities.
		-NA-	NDA has a couple of years of experience of funding projects under its socio-economic policy. SG has agreed that a BP should be produced with information and advice that draws on this experience. CS8 published re Chapelcross socio-economic support (SG July item 7).	An objective could be formulated to encourage appropriate applications for socio-economic funding from member authorities with NDA sites.	20 To promote good practices in applications to NDA for socio-economic funding.
Local Engagement Arrangements	During NDA review of arrangements, NuLeAF encouraged more effective relationships between Site Stakeholder Groups (SSGs) and LAs	16 Encourage member authorities with licensed nuclear sites to ensure that effective engagement arrangements with SLCs and NDA are in place, either through the SSG or direct engagement.	New NDA guidance for SSGs came into effect in April 09.	Objective still relevant and appropriate.	21 Encourage member authorities with licensed nuclear sites to ensure that effective engagement arrangements with SLCs and NDA are in place, either through the SSG or direct engagement.