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Response – Nuclear Power
Consultation 2007
Freepost SEA 12430
Thornton Heath
CR7 7XT

9 October 2007

Dear Sir/Madam,

Comments on 'The Future of Nuclear Power'

I write on behalf of NuLeAF - the Nuclear Legacy Advisory Forum of the Local Government Association - to submit comments on some of the proposals contained in the Consultation Document (CD) on 'The Future of Nuclear Power'.

It is not within NuLeAF's remit to form a view on whether new nuclear power stations should be built, but it does have responsibility to comment on any implications for nuclear legacy management. For this reason, the comments below focus only on those questions relating to the ways in which the interactions between any new build and legacy management should be handled.

The CD makes it clear that new nuclear build could impact on nuclear legacy management in a number of ways, including strategies for the interim and long-term management of radioactive waste, and for decommissioning.

The potential implications include:

- the requirements for the number and location of interim storage facilities, particularly for Intermediate Level Waste and spent fuel;
- requirements for the number, location and capacity of Low Level Waste disposal facilities, either at existing nuclear sites, or new regional or national disposal facilities;
- impact on site end states or the time period within which the end state might be reached; and
- the impact on the inventory of wastes for emplacement in a geological repository, and implications for repository size and cost.

In the light of NuLeAF's remit, the questions of most relevance are:

Special Interest Group on Nuclear Decommissioning and Radioactive Waste Management



Question 8: Do agree or disagree with the Government's views on waste and decommissioning? What are your reasons? Are there any significant considerations that you believe are missing? If so, what are they?

The Government's current views are insufficiently clear about how the interactions between any new nuclear build and legacy management should be handled. It is proposed that the following requirements should be adopted as Government policy:

- in developing proposals for new build at specific sites, the developer should ensure that it identifies the requirements for on and off-site facilities for radioactive waste management and decommissioning, and the implications for existing, planned or anticipated facilities for managing the nuclear legacy on or adjacent to the site concerned and for any regional or national facilities;
- the developer should ensure that it briefs the local planning authority and Site Stakeholder Group on those requirements and implications at the pre-application stage, and through subsequent applications steps;
- the developer should brief the NDA on those requirements and implications at the earlier opportunity;
- the developer should publish the above information;
- in liaison with the NDA, and taking into account the views of local authorities and the communities they represent, the developer must ensure that its proposals for radioactive waste management and decommissioning do not prejudice effective management of the nuclear legacy; and
- steps will be taken to ensure that the recruitment of staff into any new build programme does not leave nuclear legacy management short of staff and skills.

Question 9: What are the implications for the management of existing nuclear waste of taking a decision to allow energy companies to build new nuclear power stations?

Local authorities that may wish to consider participation in the siting process for a geological repository will be concerned about the possibility of future changes to the amounts and types of waste being considered for emplacement within the repository.

CoRWM recommended that any substantive increase to the radioactive waste inventory for geological disposal will require an additional step in the negotiation process with host communities to allow them to take a decision to accept or reject any additional waste. Although the CD makes a welcome reference to "open and transparent discussions with any volunteer host communities over the final inventory of wastes and materials that may ultimately be proposed for inclusion" (para 8.28), adoption of the CoRWM recommendation would provide additional re-assurance.

I hope that these comments are of value.

Yours sincerely,

Fred Barker

Executive Director
NuLeAF