

Meeting:	NuLeAF Steering Group, 29 October 2008
Agenda Item:	6
Subject:	NDA Strategy Review and Developments
Author:	Fred Barker
Purpose:	To report on progress with the NDA strategy review and other developments

Introduction

This report provides an overview of progress with the NDA strategy review and other NDA-related developments.

It covers:

- The first meeting of NuLeAF's Strategy Review Group
- Submission of comments on the NDA's Pu Options Paper
- Arrangements for a NuLeAF seminar on 2 December on 'The Future of Nuclear Legacy Management in the UK'
- NDA Funding Arrangements
- 'Safe Secure Sites' contingency planning
- Comments to CoRWM on interim storage
- Workshops on interim storage
- National Stakeholder Group, 5-6 November.

Recommendation

It is recommended that the Steering Group endorse arrangements for the seminar on 2 December as outlined in this report.

1 Meeting of the Strategy Review Group (SRG)

The first meeting of NuLeAF's SRG took place on 29 September. The note of the meeting is attached as Annex 1.

The meeting was provided with an update on the NDA Strategy Review. This included that:

- the NDA 'baseline issues' report (responding to the discussion at the National Stakeholder Group in May) is delayed until October;
- a short period of consultation on the NDA Scoping Report for Strategic Environmental Assessment of draft Strategy closed on 11 September; and
- consultations on two topical strategies were underway (on Pu options and on supply chain development).

The main outcomes from the SRG meeting are:

- development of a paper recommending NuLeAF strategic objectives for 2009 (see AGM agenda item 5)
- comments on the Pu Options Paper (see below)
- agreement to hold a NuLeAF seminar on 2 December (see below).

2 Comments on the Pu Options Paper

The UK has accumulated a substantial stockpile of separated plutonium as a result of the reprocessing of spent fuel. This material is currently stored at Sellafield. The NDA Pu Options Paper provides a preliminary overview of options for managing this plutonium. The paper notes that "the future management of plutonium stocks will have far-reaching consequences for the UK".

Following discussion at the SRG, the comments attached as Annex 2 have been submitted to the NDA. These comments suggest factors that the NDA should take into account in further assessment, and options which could be screened out at this stage. The comments also highlight the importance of providing further information and opportunity for stakeholder comment.

The NDA intends to submit recommendations to Government by the end of the year.

3 NuLeAF Seminar on the Future of Nuclear Legacy Management

The SRG agreed that a NuLeAF seminar should be arranged in Local Government House, London, on 2 December (11.00 - 3.30).

The aim of the seminar will be to brief councillors and officers from NuLeAF member authorities on key issues in the NDA strategy review, and facilitate discussion of local authority views on those issues.

The proposed agenda is attached as Annex 3. The NDA has accepted an invitation to provide speakers.

4 NDA Funding Arrangements

The Government has now responded to the BERR Select Committee comments on NDA funding. The SG will recall that the Select Committee expressed the view that the NDA's funding model is unsustainable and that nuclear decommissioning is too important to be left to the mercy of changing priorities in the Treasury and the NDA's uncertain commercial income.

The Government states that:

The funding model was originally selected because it incentivises NDA to make the best use of its existing assets for revenue generation, minimising decommissioning costs for the taxpayer, whilst providing ring-fenced funding from BERR's budget.

Government has agreed that it will consider whether there are changes that could be made to the NDA funding model to better enable its funding to be managed effectively while maintaining the right incentives and controls. It has been agreed that these options will be considered by HMT in advance of the next spending review.

CoRWM have also noted that at its recent meeting the NDA Chair and Chief Executive confirmed that they were exploring with Government funding flows, contingency funding, flexibility re year-end funding, and possible ring-fencing (CoRWM Document 2426, September 08, para 16). CoRWM has noted the importance of security and confidence in NDA funding. It is monitoring developments and is likely to report further in the Spring of 2009.

5 'Safe Secure Sites' (S3) Contingency Planning

S3 is a potential programme to put all Magnox sites into a "safe" state by 2012-15 and thereafter to maintain them for 10 years with a limited workforce to allow cost savings to be re-invested elsewhere and to allow new techniques of remediation to be proven.

Adoption of the programme would bring forward the run down of the workforce at Magnox sites and could lead to a loss of decommissioning skills. It may also involve additional expenditure to make plant and buildings safe and secure for the S3 period.

S3 is one of a range of options for Magnox sites. The secretariat is seeking to establish the NDA's decision-making timetable and process for adoption of its preferred approach. It will monitor the situation and press for any programme to pay proper regard to the impacts upon local communities. Opportunities to do so are likely to arise at the NSG on 5-6 November (see below) and NuLeAF seminar on 2 December (see above).

6 Comments to CoRWM on Interim Storage

CoRWM invited comment on the interim storage part of its work programme by 30 September ([CoRWM Document 2403](#)). The ED submitted the comments at Annex 4, based on the SG's previous concerns about the need for engagement on the possibility of consolidating interim storage at a smaller number of sites.

7 Workshops on Interim Storage

Two workshops are taking place on interim storage:

- 16 Oct: Magnox South workshop to contribute to their review of strategy for the interim management of ILW. Officer contacts from Essex CC, Kent CC, Somerset CC, Stroud DC and Suffolk CC are attending, in addition to the Executive Director.
- 28 Oct: NDA workshop on their review of interim storage arrangements. The Chair and Vice-Chair and officer contacts from Cumbria CC and Somerset CC are attending, in addition to the Executive Director.

A verbal update on the outcome of the workshops will be provided at the SG meeting.

8 NDA National Stakeholder Group (NSG)

The next NDA NSG is taking place on 5-6 November. The agenda is likely to focus on NDA's draft Business Plan and progress with the Strategy Review. NuLeAF is represented at the meeting by the Chair, the Executive Director and an officer from Cumbria County Council.

A report of the key points from the meeting will be considered at the next meeting of the SRG (date to be identified) and SG meeting on 3 February 2009.

Annex 1: Note of Strategy Review Group Meeting, 29 September 2008, Manchester

In attendance:

Fred Barker - NuLeAF
Catherine Draper - NuLeAF
Cllr Allan Holliday – Chair and Copeland Borough Council
Stewart Kemp – Cumbria County Council
Cllr Bill Risby – Manchester City Council
Cllr Julian Swainson – Vice Chair and Suffolk County Council
Cllr Bernard Whittle – Lancashire County Council

1. Apologies

Apologies were received from: Fergus McMorrow, David Davies, Mark Woodger, John Pitchford, Kerry Rickards.

2. Purpose of the group.

It was agreed that the purpose of the group should be to “review developments relating to the NDA strategy review and promote an effective input from NuLeAF and its member authorities.”

3. Overview of NDA strategy review.

It was agreed that the ED should write to the Acting CEO of the NDA registering concern that the NDA response to the outcomes of last NSG meeting was not yet available.

Action: FB

4. NuLeAF strategic objectives.

The group reviewed the draft strategic objectives and identified where additions or amendments were needed.

These were:

Key Issue 1: Review of NDA strategy

Re development of NDA funding models and asset optimisation, add qualification re requirement for: an open and transparent approach; effective engagement with local authorities; robust regulation; and due regard being paid to the long term (rather than short term commercial benefit alone).

Add an objective about encouraging development of a robust, transparent and participative process for informing NDA decisions about prioritisation of spending across sites.

Key Issue 2: The development of LLW strategy

Re encouragement of development of local or regional LLW management facilities at existing nuclear sites, rather than at non-nuclear sites, to add the qualification that this should be subject to implementation of the waste hierarchy and suitability of the nuclear licensed site in question.

Add an objective about encouraging waste planning authorities to develop policy in Minerals and Waste Development Frameworks on the management of LLW (and VLLW) in their area.

Key Issue 3: The siting of a Geological Disposal Facility (GDF)

Add an objective about ensuring member authorities are briefed and up-to-date on developments in the GDF siting process.

Key Issue 4: The nuclear legacy management implications of new nuclear power stations

To add the rider “If Government continues to encourage the building of new nuclear power stations” at the start of the objectives.

To delete the third proposed objective about encouraging authorities to explore the ways in which new build development may benefit local management of the nuclear legacy.

Overall, subject to the above additions and amendments, to recommend the proposed strategic objectives to the Steering Group.

Action: FB

5. Topical Strategy Review

It was agreed to submit the proposed set of comments on Pu Options to the NDA.

Action: FB

6. Seminar, 2 December.

It was agreed that NuLeAF should organise a seminar on 2 December at LG House, London on the NDA Strategy Review. FB to invite NDA to provide speakers.

Action: FB

7. Date of next meeting.

The next meeting will be scheduled after the meeting of the Steering Group on 29 October, and subject to developments in the NDA Strategy Review.

ANNEX 2: COMMENTS ON NDA PU OPTIONS PAPER

----- Original Message -----

From: [Fred Barker](#)

To: [Plutonium](#)

Cc: nicole.hough@nda.gov.uk

Sent: Wednesday, October 01, 2008 9:34 AM

Subject: Comments on Pu Options Paper

Dear Dr Gilchrist,

Thank you for opportunity to comment on the Pu Options paper, which we found to be a useful preliminary overview of the options for Pu management.

The Pu Options Paper was considered at a meeting of NuLeAF's Strategy Review Group on 29 September.

Our comments are as follows:

1 Drivers to include in final analysis

We agree with the factors to be included in further analysis (p2-3). We also wish to highlight the importance of the drivers for change as identified in the final report of the PuWG of the BNFL National Dialogue (March 03, p15-16). These are that separated plutonium in powder form cannot be considered sufficiently 'passively safe' for long-term storage and that for security reasons there are likely to be increased international pressures to reduce stockpiles of separated Pu. These drivers provide significant reason to implement options other than the continued storage of separated plutonium.

2 Factors to take into account in considering 'immobilise and dispose' options

A possible addition to the factors listed under 'processing and storage' on p7 is 'use of existing facilities', which in theory offer the potential for reduced costs.

With regard to the 'low spec MOX' option, we note the argument on p9 that it seems unlikely that the SMP could be converted to enable 'low spec MOX' production before the end of its design life. The case for the low spec MOX option is considerably weaker if indeed this proves to be the case. If an immobilisation option was to be preferred and a new processing plant required, then it would appear preferable to focus on the HIP option.

3 Immobilisation with HLW

We support the preliminary conclusion that the advantages of this option in terms of increased proliferation resistance are outweighed by the disadvantage in slower hazard reduction at Sellafield. We consider the disadvantage to be sufficiently strong to rule out this option from further consideration.

4 Inert Matrix Fuel

We note that NDA is minded to reject this option, but we consider that convincing evidence should be provided before this is done. In particular, we note the conclusions of the PuWG of the BNFL National Dialogue that IMF may offer significant advantages over MOX in terms of intrinsic proliferation resistance and enhanced disposability. This appears to be contrary to the *assertion* in the Pu Options Paper that IMF offers little advantage. Further assessment of potential advantages should be made available for stakeholder comment prior to rejecting this option.

5 Factors to take into account in further assessment of the MOX fuel option

We note the comment in the Pu Options Paper that the MOX fuel option would require a new MOX plant and production to much tighter timescales than currently anticipated. In view of experience with the SMP, the case for this option would be questionable if NDA were unable to provide a convincing explanation of the reasons for confidence that a new MOX plant could be built and operated to schedule and cost.

In addition, given the lack of experience of using MOX fuel in UK reactors and the need for explicit consideration in security and safety case development and licensing, consideration should be given to whether the proposed use of MOX is likely to affect local stakeholder acceptability of new nuclear build.

The potential impact of spent MOX on the GDF 'footprint' and on the timeframe for waste emplacement and GDF closure should also be taken into account.

6 Selling Plutonium

We would have major concerns about the security implications of this option if it were to involve the large scale international transport of separated plutonium. Large scale transport would increase the risk of a terrorist incident, which could involve a serious challenge to existing security arrangements.

7 Summary and short-listing of options

The presentation of the NDA's preliminary assessment in the form of a 'traffic light' table is to be welcomed (although a larger format and explanation of the colour coding would have been helpful).

In our view, however, some of the conclusions in the table do not appear to be justified by the number of 'red lights' and/or discussion in the main body of the report.

In particular, taking into account the comments above:

- immobilisation with HLW - receives three red lights and should be screened out now, rather than taken forward for further assessment
- dispose as cement - receives four red lights and should be screened out now
- direct sale - requires further consideration of the challenge to security arrangements and proliferation resistance
- MOX fuel - requires further explanation of reasons for confidence that a new MOX plant could be built and operated to schedule and cost, and consideration of impact of potential use on (a) local acceptability of new build proposals and (b) GDF footprint and timescales for operation and closure
- IMF - should be included in table pending further assessment and clarification of potential advantages compared to MOX fuel.

In view of the comment above on MOX fuel, it is also questionable whether the 'de-selection' criterion of 'technical maturity' adequately captures other aspects of 'implementability', including technical risks and political acceptability.

8 Full assessment and report to Government

As stated in the Pu Options paper, "the future management of plutonium stocks will have far-reaching consequences for the UK". We therefore consider it important that further information and opportunity for comment be available to stakeholders as the assessment and Government review progresses.

In particular, we would wish to see and comment upon a much more detailed options assessment before NDA submits recommendations to Government.

We would also like to be kept informed of developments, including the outcome of the Pu Workshop on 15 October.

I hope that these comments are useful.

Yours sincerely,

Fred Barker
Executive Director,
NuLeAF

ANNEX 3: 'THE FUTURE OF NUCLEAR LEGACY MANAGEMENT IN THE UK', NuLeAF Seminar, 2 December 2009, LG House, London

Agenda

10.30	Registration and coffee/tea
11.00	Welcome and introduction
11.05	Overview of the NDA Strategy Review
11.30	Strategic Issue 1: Prioritisation and timetable for decommissioning and clean up
12.45	Lunch
1.15	Strategic Issue 2: Geographic approaches to radioactive waste management
2.30	Strategic Issue 3: Commercialisation of nuclear legacy management
3.15	Concluding Remarks
3.30	Close

Proposed Approach

Top table for chair and speakers.

Cabaret style layout for participants (eg 4 blocks of tables each seating 10 people?).

Speakers present (using PP) for 15 minutes each.

Plenary Q&A for 10 minutes after 'overview of NDA strategy'.

After each 'strategic issue' presentation:

- 20 minutes of at table discussion (identifying a max of three key Qs and three comments per table)
- 40 minutes of plenary discussion (each table asks its key Qs and makes its key comments)

Each table to have nominated spokesperson who ensures key Qs/comments identified and put.

Pre-papers for participants to include: agenda and AGM strategic objectives paper.

On day pack to include copies of PP presentations (3 slides to a page) and attendance list.

ANNEX 4: COMMENTS ON INTERIM STORAGE

----- Original Message -----

From: [Fred Barker](mailto:Fred.Barker@nra.gov.uk)

To: contact@corwm.org.uk

Sent: Monday, September 22, 2008 11:14 AM

Subject: Comments on interim storage: Doc 2403

Dear CoRWM,

I write in response to your invitation to submit views on the interim storage part of your work programme, as described in doc 2403.

One of NuLeAF's concerns is that NDA should take steps to ensure timely and appropriate engagement with local authorities on the possibility of consolidating storage of ILW at a smaller number of sites.

Thus in April 07, the following was reported to the NuLeAF Steering Group:

As reported to previous meetings of the SG, the NDA has a long-standing commitment to engage stakeholders in its review of options for rationalising the interim storage of intermediate level wastes (ILW). This review could impact on the location of the site or sites for storing operational ILW from Berkeley, Bradwell, Culham, Dungeness, Harwell, Oldbury, Sizewell, Winfrith and Wylfa, which amounts to about 5% of the NDA's ILW inventory.

Although the Executive Director has previously offered assistance to the NDA to facilitate local authority involvement in the review, little progress appears to have been made. There is now a risk that the NDA will revert to a more traditional style of consultation on a developed set of proposals, without prior involvement of potentially affected local authorities in options assessment. This runs counter to recent trends towards early, participative forms of engagement.

Concerns about the lack of involvement of local authority stakeholders in the review of ILW storage options have been fed into the NDA review of stakeholder engagement.

A year later the NuLeAF Steering Group was briefed as follows:

In its published strategy NDA committed to investigate opportunities for optimisation of ILW storage at a smaller number of sites. It is understood that the proportion of ILW that might be involved amounts to about 5% of the ILW inventory that will arise at NDA sites before 2040. Although subject to further discussion and potential change, it is understood that provisional recommendations are that:

- NDA should continue to encourage waste minimisation opportunities to help reduce the overall number of ILW packages and storage requirements.
- The main focus of investigating storage consolidation opportunities should be southern Magnox and UKAEA sites.
- The current baseline plans for ILW stores at Dounreay, Hunterston A, Sellafield, Trawsfynydd and Hinkley Point should be pursued.
- Local site-to-site opportunities should be investigated for the relatively small quantities of ILW at Chapel Cross and Wylfa.
- Opportunities should be pursued for five Magnox sites (Oldbury, Dungeness A, Bradwell, Sizewell and Berkeley) to consolidate ILW at NDA sites with an existing or committed store (if volume minimisation initiatives free up capacity), OR to transfer ILW to a

separate regional store located at one of the NDA sites with an existing or committed store.

- UKAEA should be encouraged to pursue opportunities for three sites (Harwell, Winfrith and Culham) to consolidate 'Magnox compatible' ILW packages at NDA sites with existing or committed stores, or to transfer ILW to a separate regional store located at one of those NDA sites. The fallback position is to have an ILW store at one, two or all three of the UKAEA sites. A separate solution is needed for 'non-Magnox compatible' packages.

As the transfer of ILW between sites will be of particular interest to local communities and their local authorities, CoRWM may consider it appropriate to discuss with NDA how it intends to engage with those stakeholders to ensure that its proposals for transfers are acceptable.

Yours sincerely,

Fred Barker
Executive Director
NuLeAF