

Meeting:	NuLeAF Steering Group, 28 April 2009
Agenda Item:	5
Subject:	Consultation on Strategies for Managing Low Level Wastes (LLW)
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Purpose:	To report on developments and impending consultations

Introduction

This report covers:

- background information on the development of the NDA's LLW strategy;
- initiatives to promote discussion of issues raised by the developing strategy;
- recent meetings and developments associated with the draft strategies; and
- plans for consultation on proposed (a) NDA LLW strategy and (b) non-nuclear industry (NNI) LLW strategy.

Recommendations

That the Steering Group agree that the Executive Director should:

- 1 Submit a report with comments on the LLW strategies to the LGA Environment Board meeting on 29 June.
- 2 Prepare a draft consultation response for consideration by the Steering Group at its meeting on 15 July.

Contribution to Achieving Strategic Objectives

The actions are intended to contribute to the achievement of the following NuLeAF objectives:

- To seek to ensure that LLW Strategy is developed and implemented in ways that can inspire local authority and public confidence.
- In the context of implementation of the waste hierarchy and subject to suitability of the nuclear licensed site in question, to encourage development of local or regional LLW management facilities at existing nuclear sites, rather than at non-nuclear sites.

1 Background

The report on LLW strategies that was prepared for the (cancelled) Steering Group meeting in February provided an overview of:

- The development of NDA LLW strategy
- The development of non-nuclear industry (NNI) LLW strategy
- Environment Agency (EA) guidance on the regulation of LLW management
- Plans for NuLeAF seminars on draft LLW strategies in May 2009
- NuLeAF case studies on developments in LLW management.

This background information can be accessed at [Feb SG report on LLW strategies](#).

Key points about the developing NDA LLW strategy are:

- There are strong drivers to implement the waste hierarchy and open up new disposal routes (including the need to substantially reduce costs and make optimum use of the limited capacity at the LLW Repository near Drigg).
- There are a large number of initiatives that could be taken, some of which involve the development or use of facilities away from existing nuclear sites, including metal treatment, incineration and landfill.
- NDA intends to place considerable emphasis on “energising the supply chain” to deliver off-site initiatives.
- The emphasis on off-site initiatives raises significant concerns and conflicts with NuLeAF strategic objectives (about inspiring public confidence and concentrating facilities at or adjacent to existing nuclear sites).

2 Initiatives to Promote Discussion

A number of initiatives have been taken to promote discussion of key issues raised by the developing NDA LLW strategy. This includes discussion of NuLeAF’s preference for the strategy to encourage concentration of LLW facilities at or adjacent to licensed nuclear sites¹.

These initiatives include:

- **Correspondence with the Planning Officers Society (POS).** The POS is supportive of NuLeAF’s views and writes that: “The principle of encouraging LLW facilities at or adjacent to licensed nuclear sites, whilst not ruling out other sites, including the possibility of using dispersed facilities at existing off-site locations, seems logical and allows flexibility in the selection process.”
- **A discussion with NDA on the draft LLW strategy at a meeting of NuLeAF’s LLW Officer Working Group (5 March).**

¹ This preference would not rule out other sites, including the possibility of using dispersed facilities at existing off-site locations, as long as such an approach has the consent of the local community and it can be clearly demonstrated that it is preferable in specific circumstances.

- **A meeting with Waste Portfolio holders on the LGA's Environment Board (19 March).** The meeting was attended by the Vice Chair, Councillor Swainson, and the Executive Director. LGA representatives at the meeting agreed that NuLeAF should provide a written report for the meeting of the Environment Board on 29 June with a proposed response to the forthcoming consultations that takes into account the discussion at the NuLeAF seminars in May.
- **Articles in *First* and *Waste Planning*.** 'Radioactive Waste, What Next?' was published in *Firstonline* on 18 March ([Radioactive waste – what next?](#)) and 'Strategies for Low Level Radioactive Wastes' was published in *Waste Planning* in early April.
- **Discussion at the Strategy Review Group (23 March).** Concerns about the emphasis on off-site initiatives were explained to NDA attendees at the meeting, including Richard Mrowicki, Head of Strategy and Business Planning (see the draft note of the meeting attached to agenda item 6).

Attention is also drawn to the series of NuLeAF seminars organised to coincide with the formal consultations on NDA and NNI LLW strategies. The aims of the seminars are to:

- Brief local authorities on the draft strategies and the approach to regulation of LLW management
- Enable NDA, the NNI Project Board and EA to receive direct feedback from a local authority audience
- Inform the preparation of NuLeAF's responses to the consultations.

The locations and dates of the seminars are:

7 May Manchester
 12 May London
 14 May Taunton

For those that have not yet registered, booking forms are available at [seminar registration](#).

The Executive Director is also making a presentation on LLW strategy at a SAFESPUR Conference on 29 April.

3 Recent Meetings and Developments

These include:

- **A meeting of the NDA's LLW Strategy Group (LSG) on 26-27 February.** This was attended by the Executive Director and officers from Cumbria County Council. The presentations to the meeting are available at [LSG Feb 09](#). NuLeAF's concerns and preferences were raised during the course of discussion.
- Through membership of the LSG, the Executive Director has had **opportunity to submit comments on a draft version of the NDA consultation paper and on parts of the associated draft Strategic Environmental Assessment (SEA)**. The comments on the draft consultation paper highlighted the importance of conforming to the Government's code of practice on written consultations, particularly on the need to:

put sufficient information into the public domain to enable an effective and informed dialogue; the need to be clear on the scope to influence the outcome; and the need to be clear about the expected costs and benefits of the proposals. The comments on the draft SEA pointed out that insufficient regard had been paid to the ‘social amplification’ of radiation risks and the impact that this can have on impacts, and the need to consider a broad definition of ‘well-being’. Further comments on the draft consultation paper have been submitted by officers from Cumbria CC to encourage adequate treatment of concerns about off-site initiatives.

- The Executive Director has participated in the LLWR’s **strategic Best Practicable Environmental Option study for high volume VLLW**. This involved participation in workshops on 22 January and 12 February. A third workshop is due to take place on 30 April.
- Planning permission has been granted for a **LLW disposal facility adjacent to the Dounreay site** in North Scotland. This will take LLW and VLLW from the Dounreay and neighbouring Vulcan site. Further details are available at [Presentation to LSG](#). A Community Fund will be associated with the development (see SG agenda item 4).

4 Plans for Consultation

Formal consultations on the NDA and NNI LLW strategies are due to start at the end of April. It is anticipated that the NDA will organise a number of stakeholder events as part of the consultation.

It is intended to submit a draft NuLeAF response to the Steering Group meeting on 15 July in Oxford. This will take into account discussion at the seminars in May. Recommendations about the way the outputs of consultation should be taken into account in decision-making are contained in the report for agenda item 3.

Consultation responses are scheduled to be discussed at the NDA LLW Strategy Group meeting on 20-21 August.