

Meeting:	NuLeAF Steering Group, 15 October 2009
Agenda Item:	7
Subject:	Interactions between Nuclear Legacy Management and New Nuclear Build
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Purpose:	To report on discussion with the NDA about the potential interactions between legacy management and new nuclear power stations.

Introduction

Although it is not within NuLeAF's remit to form a view on whether new nuclear power stations should be built, it does have responsibility to comment on any implications for nuclear legacy management. In this context, this report provides a summary of discussion with the NDA about the potential interactions between nuclear legacy management and new nuclear power stations.

Recommendation

It is recommended that the Steering Group agree to write to the NDA to request that it promote debate amongst its stakeholders at national and local level about:

- the potential interactions between nuclear legacy management and new nuclear build;
- how a more coordinated 'across site' approach could be taken to waste management and clean-up in locations that have or are proposed to have multiple licensed nuclear sites; and
- the pros and cons of the ways in which the synergies with new nuclear build could be exploited to the benefit of nuclear legacy management.

Contribution to Achieving Strategic Objectives

The activities described in this report relate to the following NuLeAF objective:

- to 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

See the AGM report item 4 for an additional proposed objective.

1 Discussion with NDA

The Strategy Review Group meeting on 23 September included a discussion about the potential interactions between legacy management and new nuclear build with Adrian Simper, NDA Strategy Director. Background to the discussion is set out in the annex to this report.

The discussion raised a number of points for further consideration:

- NDA and Government are considering the implications for nuclear skills. Discussion is taking place about the scope for timetabling legacy management and new build activities in a way that avoids significant skill shortages. NDA is considering the scope for 'labour leasing', where workforce could be made available for new build during periods of low activity in legacy management.
- There is concern amongst local authorities about whether staffing levels in nuclear legacy management can be maintained, if people working on NDA sites seek employment in new build projects.
- The strategy for managing LLW being developed by NDA will apply across the UK's nuclear sectors, including new build. Compared to existing stations, the amount of LLW that would arise from operation of new nuclear stations is relatively small.
- Site 'end state' discussion is likely to need re-opening at sites where new build takes place. Where previously lacking, this discussion should pay more regard to local development plans.
- There is a view amongst local authorities with multiple neighbouring nuclear sites that a more coordinated approach should be taken to waste management and clean-up across those sites (ie across A, B and potential C station sites). Further thought needs to be given to the potential roles of NDA and local planning authorities in how to achieve this. There are likely to be a number of institutional barriers to address or overcome (eg different ownership, nuclear site licensing and planning permissions).
- Such an approach could take a number of forms. For example, waste management facilities at or adjacent to NDA sites could be offered on a commercial basis to operators of new build stations; or waste management facilities could be developed by new build operators that provide a commercial service to the NDA site. The business case for a facility at or adjacent to an NDA site would probably be stronger if the facility were also to be used for neighbouring B and possible C sites.
- Some local authorities would be concerned if the boundaries between legacy management and new build became too blurred.
- There is a need for more discussion and debate about where the boundaries should be, and on the pros and cons of the different ways in which the synergies with new nuclear build could be exploited to the benefit of nuclear legacy management.
- The debate is not currently taking place within the NDA's formal review of Strategy.

2 Next Step

It is proposed that the Steering Group agree to write to the NDA to request that it encourage and promote debate amongst its stakeholders at national and local level about: the potential interactions between nuclear legacy management and new nuclear build; how a more coordinated 'across site' approach could be taken to waste management and clean-up in locations that have or are proposed to have multiple licensed nuclear sites; and the pros and cons of the ways in which the synergies with new nuclear build could be exploited to the benefit of nuclear legacy management.

Annex: Background on the Interactions between Nuclear Legacy Management and New Nuclear Build

New nuclear build could impact on nuclear legacy management in a number of ways, particularly on implementing 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.

NuLeAF Briefing Paper 9 ([BP9, July 07](#)) argues that there needs to be greater clarity about the way interactions between any new nuclear build and legacy management should be handled. It proposes 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 application steps;
- the developer should brief the NDA on those requirements and implications at the earliest 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.

The following points about the links between legacy management and new build were made at the NuLeAF seminar in December 2008:

There is a need to look at the potential synergies in land use at multi-station locations, particularly in the context of potential new build. How can local authorities encourage Government to think about this? NDA recognises that there are synergies and, if within its powers, would wish to exploit them to the benefit of nuclear legacy management. The Office for Nuclear Development is aware of the potential synergies.