



By email to: businessplanning@nda.gov.uk

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Dear Sir or Madam,

Draft NDA Business Plan 2014-17 consultation response

1. Introduction

NuLeAF (the Nuclear Legacy Advisory Forum) is a Special Interest Group of the Local Government Association (LGA). NuLeAF is supported by 110 local authorities and 3 national park authorities across England and Wales. Our remit encompasses all aspects of the management of the UK's nuclear waste legacy. Our primary objectives are:

- to provide a mechanism to identify, where possible, a common, local government viewpoint on nuclear legacy management issues;
- to represent that viewpoint, or the range of views of its member authorities, in discussion with national bodies, including Government, the NDA and the regulators;
- to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities; and
- to develop the capacity of its member authorities to engage with nuclear legacy management at a local level.

NuLeAF is funded by the NDA and our member authorities. Our comments on the draft NDA Business Plan 2014-17 consultation are set out below.

2. Overview

The Business Plan 2014-17 restates the NDA's mission, to *'Deliver safe, sustainable and publically acceptable solutions to the challenge of nuclear clean up and waste management. This means never compromising on safety or security, taking full account of our social and environmental responsibilities, always seeking value for money for the taxpayer and actively engaging with stakeholders.'*

Special Interest Group on Nuclear Decommissioning and Radioactive Waste Management

This mission statement includes several linked elements of particular importance to local authorities and the communities they represent. We believe that *publically acceptable solutions* can only be delivered through meeting *social and environmental responsibilities* and *actively engaging with* (and sustaining the confidence of) *stakeholders*.

The NDA will spend over £3Bn of largely public money per year over the period covered by the Plan. This spending must be informed by stakeholders including local government and local people, listening to and addressing their concerns. NDA programmes should seek to maximise the wider benefits to communities and the environment.

The Business Plan is a concise document setting out a range of actions by the NDA and partners over 2013-17. It does not provide detail on how these actions will be delivered. While we appreciate that this is a high level document, the lack of detail as to the actual actions that NDA will undertake means that in many cases it is difficult to pass meaningful comment.

For example, as we note below, expenditure on socio-economic issues, skills, R&D and knowledge management will fall between 2013/14 and 2014/15. Without more information it is hard to comment on this beyond the fact that the fall in expenditure is disappointing and does not seem consistent with the NDA's mission.

3. Comment on Strategic Themes

Site Restoration We agree with NDA that Sellafield presents the most complex and challenging site within the NDA estate and we therefore support the prioritisation given to action on the Legacy Ponds and Silos. However, we would like NDA to identify more clearly whether there are opportunities to accelerate any programmes, either at Sellafield or elsewhere.

Spent Fuels Regarding spent fuels, we believe there is a need for a better understanding of the business case for continued reprocessing until FY2019/20 and what the 'opportunity costs' for Sellafield site decommissioning and clean-up are. Continued reprocessing delays POCO on the reprocessing plants themselves and delays POCO in the vitrification and HAST plants.

Nuclear Materials The Business Plan does not provide any information on the options for the management of the Plutonium (Pu) stockpile, beyond a reference on page 17 to '*Develop(ing) the approach for implementation of the safe and secure storage of plutonium*'. Information on possible options for Plutonium reuse and disposal should be provided.

Integrated Waste Management On page 12 the Plan refers to '*continued delivery of Highly Active Liquor (HAL) stock reduction*' although reprocessing continues to generate HAL. We believe more information on this issue should be provided. At a broader scale, NuLeAF believes that NDA should develop an over-arching UK High Level Waste (HLW) Strategy to compliment the Low Level Waste (LLW) Strategy, though we realise it is for Government to direct this task to NDA.

Critical Enablers We are disappointed to see (p10) that expenditure on socio-economic issues, skills, R&D and knowledge management will fall between 2013/14 and 2014/15 from £31M to £29.4M.

The lack of a breakdown of this spend makes it difficult to comment further and we would welcome more information as to how this headline sum is divided between the different elements. This is an issue we raised in our submissions on the 2012-15 and 2013-16 draft Business Plans and it is disappointing that again it has not been addressed. We would also like to see significantly more information as to how the socio-economic needs of individual sites will be met.

We support the commitment by NDA to further develop procurement strategies and policies which aim to deliver at least 20% of the external supply chain with Small and Medium Enterprises (SMEs) in line with Government support for the sector. NuLeAF has long backed an approach to procurement that as far as possible supports smaller, local businesses around NDA sites. The NDA has a huge annual spend and it is important that host communities gain the maximum possible advantage from this. We would

We also wish to see a clear commitment to community benefits principles that underpin both delivery of NDA work programmes and support to communities around NDA sites. NuLeAF will, in the near future, publish a revised position paper on Community Benefits and we hope to engage with NDA further on this issue over the coming year.

In addition, NuLeAF would welcome the opportunity to be engaged in the preparation for publication of Strategy III.

4. NDA Sites

In general we would like more information on how learning from the experience of the first term of the Sellafield PBO contract can be applied elsewhere (see page 40 reference to benefit realisation of Magnox and RSRL competitions). Given the significant issues identified in terms of the PBO management at Sellafield, it is vital that lessons are learned.

We also wish to raise the following:

- Reference is made on p16 to the Sellafield 'Excellence Plan'. We are not aware of this document or its purpose and would welcome more information on this.
- We are not clear what costs are carried at Sellafield through '*optimisation of electricity generation at Wylfa*' – page 18. Again, some more explanation would be welcome.
- We believe that some explanation should be provided on the impact of co-location proposals on Magnox sites.

5. RWMD and the Geological Disposal Facility (GDF)

The decision of Cumbria County Council not to proceed to Stage 4 of the MRWS process has caused Government to begin a new process through which to identify a host community for a GDF. The failure of the previous process demonstrated the central role that local authorities and communities have to play in the identification of potential sites for a deep store and in consenting to its construction.

We support the need for a national campaign of 'awareness raising' (page 41) but believe that engagement as well as awareness raising is required. We believe that NuLeAF has an important role to play in any such campaign and would welcome more information on what is planned. We welcome the commitment to '*engage with stakeholders to ensure the issues management processes meet stakeholder needs.*'

Finally, in relation to '*planned disposability assessments*' (p42) we believe it is important that the opportunities to divert wastes from a GDF as well as dispose of waste are considered.

I hope these comments are helpful to you.

Yours faithfully,



Philip Matthews

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