

Meeting:	NuLeAF Steering Group, 25 April 2012
Agenda Item:	6
Subject:	NDA Strategy Development
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Purpose:	To report on developments

Introduction

This report covers:

- strategy development on Integrated Waste Management (IWM)
- strategy development on Site Restoration
- an update on the proposal for a Community Benefits Protocol
- future engagement meetings with NDA

Recommendation

That the Steering Group agree to:

- 1 Write to the NDA to welcome the proposed strategy development programme on site restoration, highlight the importance of engagement with local authorities at appropriate points as the programme develops and reiterate the offer of assistance to help facilitate that engagement.
- 2 Review potential approaches to securing Community Funds when agreement has been reached in West Cumbria relating to the Sellafield site, and when further information is available about the implications of current discussions about LLW disposal routes and ILW treatment and storage consolidation.
- 3 Organise further engagement meetings between NDA, Site Licensee Companies and local authorities as appropriate.

Contribution to Achieving Strategic Objectives

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

- Encourage NDA and SLCs to engage early and effectively with the relevant local authorities when considering options for centralised and multi-site approaches, and to only move forward with such approaches where they are supported by the affected local authorities in the light of the overall balance of benefits and disadvantages.
- Seek to ensure that a consistent, proportionate and transparent approach can be taken to the establishment of Community Funds associated with key radioactive waste management facilities.

1 Strategy Development on Integrated Waste Management (IWM)

Two presentations were made at the NuLeAF seminar on 9 March about IWM. The first presented an overview of the strategy development programme. The second presented an outline of progress on proposals for Intermediate Level Waste (ILW) consolidation. Summaries of the presentations, and the Q&A session that followed, are contained in Annex A to this report.

The meeting of NDA's IWM Topic Overview Group on 22 March received a more detailed update on development of NDA's thinking on IWM. This meeting was attended by the Executive Director (ED) and David Palk from Suffolk CC.

The meeting heard that:

- NDA's current thinking is that 'local' consolidation of ILW storage, involving Magnox stations in England and their neighbouring sites, may offer most potential ie between A and B stations. NDA is entering into preliminary discussions with site owners to assess the potential for this sort of consolidation. Engagement with the relevant local authorities will follow. Note that 'local' consolidation contrasts to a potential 'regional' approach for Magnox sites, which is thought to offer only modest cost savings.
- Eight credible options for the application of thermal treatments to ILW are being assessed. This has included the trialling of various methods at Sellafield. Such treatments are most likely to be applicable to Sellafield waste streams, but could also provide a contingency for any Magnox ILW streams that are not suitable for storage or disposal in ministores. Identification of preferred options is not scheduled until March 2013.
- NDA has an 'upstream optioneering' project to support the development and implementation of opportunities to optimise the management of wastes and materials that may be disposed of in a Geological Disposal Facility (GDF). This has collated, analysed and prioritised opportunities from across the NDA estate, and is about to enter the delivery phase of work.
- The NDA is establishing a new working group on the implementation of strategy on VLLW management (see earlier SG item on LLW management for further details).
- The NDA is shortly to publish the revised version of its IWM strategy development programme, following consultation earlier this year.

The next meeting of the IWM Topic Overview Group is on 28 June.

Member's attention is also drawn to the NDA's recent publication of an overview of all its higher activity waste, which provides details of where the waste arises and how it is being dealt with. This is available on the NDA website at:  [An overview of NDA higher activity waste February 2012](#) (3Mb)

2 Strategy Development on Site Restoration

The NDA has published a draft strategy development programme for site restoration for comment by 31 May. This is available on the NDA website at [Site restoration draft paper for comment](#).

The draft programme outlines the NDA's current strategy for site restoration, which it states provides a clear direction of travel. The document then describes the remaining strategic issues and NDA's proposals for resolving them.

The issues include, for example: the balance between in-situ and ex-situ management options; the forms of institutional controls appropriate to different next planned uses of a site; the tensions between continuous and deferred restoration; and the appropriateness of particular interim states.

In order to address these issues, the NDA proposes to develop five key products:

- principles for defining site end states;
- an NDA perspective of options for future use of NDA land;
- principles for prioritising restoration projects;
- principles for defining 'interim states'; and
- regulator guidance on institutional controls that apply throughout site restoration.

The NDA's proposed schedule includes preparation of the following:

May 2012	a practitioner's guide to defining site end state options
June 2012	a draft position on the optimal pace of restoration a practitioner's guide to defining site interim state options a draft NDA perspective of options for next use of NDA land
Sept 2012	draft optimal interim and end states
Dec 2012	publish NDA perspective of options for next use of NDA land and principles for prioritising restoration projects
Mar 2013	publish regulator guidance on institutional controls
June 2013	publish principles for defining site end states and interim states
June 2013	SLCs assess credible and preferred options for interim and end states using the five key products.

NDA note that this schedule is subject to change.

On the NDA perspective of options for next use of NDA land, the document states that:

Strategy II expresses our preference to restore our sites to a condition suitable for their next planned use. Therefore, to inform future Site End State reviews, NDA intends to articulate its perception of what the next use of our sites might be. This needs to reflect other areas of strategy development, for example concerning waste consolidation and on-site waste management.

We will also take the opportunity to identify and where appropriate articulate nearer term opportunities for releasing parts of sites for other uses.

This piece of work will involve conversations with local authorities in respect of local area development plans and will engage other local stakeholders, if and when the time is considered to be right.

The proposed schedule anticipates that NDA will move from draft to final versions on this between June and December this year. The ED has offered NuLeAF's assistance in

facilitating the “conversations with local authorities” and this might form the basis for a substantive agenda item at a future engagement meeting with NDA (see below).

It is proposed that NuLeAF write to the NDA to: welcome the proposed strategy development programme; highlight the importance of engagement with local authorities at appropriate points as the programme develops; and reiterate the offer of assistance to help facilitate that engagement.

3 Update on the Proposal for a Community Benefits Protocol

At its meeting in October 2011, the SG approved a note setting out the basis for discussion with NDA. The SG will recall that the purpose of a protocol would be to: (a) provide a nationally agreed framework for negotiation of local community benefits that are separate and additional to mitigation measures (Section 106) and (b) ensure that regional or national needs in radwaste management are met in a way that is fair and reasonable at a local level. The proposed scope of the protocol is that it would apply to facilities for the treatment, storage or disposal of radioactive wastes (other than a GDF) that fulfil a role in implementation of national strategies by managing radioactive wastes from more than one site, customer or sector.

The ED had a preliminary discussion with NDA about the proposed Community Benefits Protocol in November 2011. At that time, NDA was not in a position to progress discussions about a national protocol because it was involved in high level ‘pathfinder’ discussions with Cumbrian local authorities about the approach that may be appropriate in relation to the large number of developments that are likely to affect the Sellafield site over the next five years, including significant transfers of wastes and materials from other sites.

The ED held a follow-up discussion with NDA on 11 April. The discussions with Cumbrian local authorities have not yet been concluded. Issues under consideration include the legislative underpinning for any agreement that might be put in place, and the scale of the support that might be provided. NDA wish to reach conclusions on these matters before seeking to identify the most appropriate approach for other parts of England and Wales. They note, however, that the number of cases where other sites may be asked to manage radioactive wastes from more than one site, customer or sector is likely to be small. As such, NDA’s preliminary view is that a bespoke approach may be most appropriate in each case, drawing on the lessons identified in the approach in West Cumbria, but without adopting a nationally agreed framework.

In the light of this, it is proposed that the SG review potential approaches – including the case for a national framework - when agreement has been reached in West Cumbria and further information is available about the implications of current discussions about ways of securing LLW disposal routes (see item 5 on the agenda) and ILW treatment and storage consolidation (see section 1 above).

4 Future Engagement Meetings

The SG will recall that NuLeAF organised engagement meetings between NDA, Magnox, RSRL, regulators and local authorities in June and November of last year, to enable discussion to take place on key issues in NDA strategy development and implementation. The reports of these meetings are on the NuLeAF website at [Engagement Meetings with NDA](#).

These meetings provide a useful forum for discussion and NDA has suggested that further meetings be organised in September 2012 and March 2013. NDA will be writing shortly to suggest key topics for discussion at these meetings. The ED has already suggested that site restoration would be an appropriate topic for a meeting in September, given the schedule for that work as outlined above.

It is proposed that the SG agree that further engagement meetings between NDA, Site Licensee Companies and local authorities be organised as appropriate.

ANNEX: SUMMARY OF PRESENTATIONS AND Q&A ON IWM AT THE NULEAF SEMINAR

Overview of the NDA Integrated Waste Management (IWM) Strategy Programme

An IWM strategy needs to address the waste hierarchy, the whole waste cycle, costs and opportunities, the proximity principle, the supply chain and open market and stakeholder engagement. The NDA's strategy management system is being used to develop IWM strategy. This enables the case for change to be identified, credible options to be defined and assessed, preferred options to be identified and strategy to be approved and implemented. IWM strategy development will address the following stages and aspects of waste management: pre-treatment, treatment, storage, disposal and, where appropriate, specific waste groups. Treatment of Higher Activity Wastes (HAW), for example, will address thermal treatments and examine the possibility of regional and mobile facilities. A new element of the work is a 6-9 month project to further develop the strategy for Very Low Level Waste (VLLW) and low activity LLW (LALLW). This will include: an assessment of arisings, need and capacity; how to accommodate different needs in different parts of the country; use of VLLW in construction of the LLW Repository (LLWR) cap; assessment of potential for on-site/near-site disposal at Sellafield; and understanding of how on-site disposal affects ability to clear sites. Underpinned by effective stakeholder engagement, the project should enable guidance to be produced that will shape how VLLW and low activity LLW strategy is implemented.

Strategy development: consolidation of Intermediate Level Wastes (ILW)

Consolidation means the movement of waste between nuclear licensed sites to secure a clear business benefit. Benefits could be realised in four ways: through early site clearance; reduction in site footprint; hazard, risk and security level reductions; and infrastructure optimisation. The approach could be on a national, regional or local basis and will support or align to other strategic initiatives, for example, on-site restoration. Case-by-case consolidation will need to be underpinned by business cases and continued stakeholder engagement. Consolidation could include: Harwell and Winfrith; southern and central Scottish sites; and the regional storage of Magnox mini-stores. Whether there is a case for the latter, for example, is still being assessed. NDA is interested in feedback on how to gain local stakeholder support, particularly in communities that could be adjacent to recipient sites.

Key points from discussion

- *IWM strategy development is leading to the production of a series of credible option papers, but will a UK-wide HAW strategy be produced akin to the UK LLW strategy?* Documentation requirements are being addressed as the programme moves forward. The NDA's IWM Strategy Development programme is focussed on the NDA estate, but will engage with other waste owners when it is appropriate to do so.
- *How could development of the ILW consolidation strategy affect anticipated proposals for a new ILW store at Harwell?* There is on-going work on credible off-site options for ILW at Winfrith. This options study will inform the preparation of the planning application for the Harwell ILW store.
- *How can Waste Planning Authorities (WPAs) deal with the uncertainties that arise from IWM strategy development, particularly about potential ILW consolidation?* Work to

establish whether there is a case for consolidating mini-stores from Magnox sites is underway. NDA should note that some WPAs are closing down the option of consolidation in their core strategies.

- *How does the Government's revision of exemption orders affect projected volumes of arisings?* The move to a radionuclide specific approach will mean that limits for some radioisotopes will go up and some will go down. Although the overall impact is unclear, some reviews indicate a trend towards reduced volumes of decommissioning VLLW/LALLW.