

<b>Meeting:</b>	NuLeAF Steering Group, 9 April 2014
<b>Agenda Item:</b>	7
<b>Subject:</b>	Service Plan 2013-15 Update
<b>Author:</b>	Philip Matthews and Stewart Kemp
<b>Purpose:</b>	To update members on progress with the actions set out in the NuLeAF Service Plan 2013-15 not covered elsewhere

### **Introduction:**

This paper covers progress in all the main areas set out in the Service Plan, excluding those for which a separate paper has been provided.

- The LLW Delivery Overview Group (DOG)
- The Submarine Dismantling Project
- The NORM Strategy
- Detailed Emergency Planning Zones
- NuLeAF website

### **Recommendation:**

The report is for noting.

### **Contribution to 2013/15 Service Plan:**

This report provides a note of progress against areas of the Service Plan, enabling members to assess the extent to which NuLeAF is delivering against the objectives set.

## **1. Report on the Low Level Waste Delivery Overview Group (DOG)**

The LLW DOG was held in Manchester on the 18<sup>th</sup> March 2014 with representatives of the industry, regulators, NDA, Government and other stakeholders in attendance.

Key messages to emerge from discussion at the event were:

### **Integration**

Many delegates argued that there was a need for better integration between management of LLW, ILW and HAW. Within low level waste management it was argued that there was a particular need to link the evolving strategies on nuclear LLW, non-nuclear LLW and NORM, given the limited number of facilities that can manage such waste. The NDA view, as expressed at the meeting, was that greater integration was not required.

### **Disposal options**

Another important discussion from a NuLeAF perspective was on the scope for greater disposal of VLLW/LALLW at conventional landfills. Despite the fact that this is already seen as an acceptable disposal route for the small amounts of waste generated by hospitals and universities, current nuclear VLLW/LALLW is disposed of at LLWR or at a small number of licenced sites.

It is intended that new Environment Agency guidance on decommissioning will be clearer about onsite disposal being a viable option and the agency plans to issue further guidance on onsite disposal in the future. The industry and NDA response was that there is a concern over legal liabilities, which has led to a risk averse culture and a perception that licensed sites are less of a reputational risk.

### **Decommissioning Guidance**

ONR are issuing new guidance on decommissioning shortly as are the Environment Agency in partnership with Natural Resource Wales. As noted above, this will clarify the scope for the use of landfill sites for VLLW/LALLW disposal.

### **Decay Storage**

It also appears that the Environment Agency may adopt a new approach to the issue of decay storage and the use of material that will in future be out of scope to landscape sites. There is other work on decay storage ongoing in NDA which shows that a large amount of waste arisings over the next 100 years may be suitable to manage in this way.

### **LLWR Environmental Safety Case (ESC) Consultation**

There were 28 responses to the consultation. Taking these on board there will be a consultation on the draft permit in autumn 2014 with a final decision made in February 2015. An EA representative expressed concern that there had been no submission on the ESC to Europe as yet as this could hold things up considerably if not done soon. It was also implied that it was by no means certain a Permit would be granted and that LLWR and NDA do need a Plan B.

## **Higher Activity Waste (HAW) Strategy**

This is in development. A draft will be consulted on from September 2014. The final version will be released early next year – probably March 2015.

## **Revised LLW Strategy**

Plans for the revision of the LLW Strategy are in development and it is anticipated that there will be early engagement with stakeholders. Plans for engagement will be released in April 2014. Dave Loudon, formerly of Sellafield Ltd, has moved to NDA and is leading the LLW Strategy review. Dave has been asked if he will give a presentation on early thinking on LLW Strategy review at the NuLeAF seminar on 16 June.

Finally, Hannah Kosich is now acting National Programmes Manager. Dave Rossiter is moving to a more internally facing job as Business Development and Change Manager at LLWR Ltd.

## **2. An update on the Submarine Dismantling Project (SDP)**

The shortlist of sites to be used for the interim storage of radioactive waste from the UK's nuclear submarines was announced on February 17<sup>th</sup> 2014. All nuclear licences sites in the UK, including those owned by NDA, the MOD and the industry were considered. Of these, 5 have been included on the provisional shortlist:

- MOD owned Atomic Weapons Establishment (AWE) Aldermaston and Burghfield, both in Berkshire
- Chapelcross in Dumfriesshire and Sellafield in Cumbria, both owned by the NDA
- Capenhurst in Cheshire

Following the announcement of this list, the MOD has now commenced a period of pre-engagement with local authorities, elected representatives and Site Stakeholder Groups (SSGs) around the shortlisted sites. NuLeAF has also been invited to attend these events and continues to engage with the SDP as a member of the Sub Group that is overseeing this work.

A pre-engagement workshop was held in Bristol on the 25<sup>th</sup> March and another is being held in Penrith on the same day as this Steering Group (9<sup>th</sup> April). NuLeAF Vice-Chair Cllr Brendan Sweeney attended the event in Bristol and will report back to Steering Group.

Based on the pre-engagement, a final shortlist of interim storage sites will be published in summer 2014. These will be taken forward as the basis for public consultation which will be carried out both locally around each candidate site, and at a national level. Public consultation is anticipated to take place in late 2014 and early 2015.

More information on the SDP and the selection process for the provisional shortlist can be found at <https://www.gov.uk/government/publications/submarine-dismantling-project-interim-storage-of-intermediate-level-radioactive-waste>.

### **3. NORM strategy development**

A consultation of the proposed Strategy for the management of NORM (Naturally Occurring Radioactive Material) was published in February 2014<sup>1</sup>. The proposed strategy is UK wide and has been developed jointly by the UK Government and the devolved administrations, with the Scottish Government taking a lead role.

The NORM Strategy is seen as the second part of a joint UK Strategy for the non-nuclear industry, the first part of which (covering anthropogenic waste from e.g. hospitals) was published by DECC in 2012.

NORM waste is produced by many sectors including the offshore oil and gas industry and also 'fracking.' Arisings of NORM are anticipated to increase significantly over coming decades.

The proposed strategy is based on (i) reforming the regulatory framework to ensure it is clear, coherent and effective; (ii) removing policy barriers to the development of a robust and efficient market for NORM waste management; and (iii) supporting efforts by waste producers and the waste management supply chain to generate better data and information about current and future NORM waste arisings.

A NORM Strategy stakeholder workshop was held in Manchester on the 25<sup>th</sup> February. The attendance was largely drawn from industry but Executive Co-Director Philip Matthews attended along with a small number of other local government representatives. Key messages from the workshop were:

- There is a huge amount of uncertainty as to the volume of NORM waste that is likely and when it will arise, with the greatest uncertainties being in the two largest sectors – the oil and gas industry and contaminated land.
- A crucial uncertainty for oil and gas sector is that the decommissioning process is closely related to oil price. If prices remain high then many oilfields will continue to operate for decades; if the oil price drops then older fields may be decommissioned in the near future
- Despite all the uncertainties, it is felt that the volumes of NORM waste, while significant, will not be on a huge scale.
- Kings Cliffe is the only site in the UK that is currently able to accept some NORM wastes. Other options are available for the majority of wastes.

Jim Cochrane of Scottish Environmental Protection Agency (SEPA), who is the lead regulator on NORM Strategy has been asked to give a presentation at the NuLeAF seminar on 16 June.

### **4. Detailed Emergency Planning Zones**

The ONR has issued revised principles for the identification of detailed emergency planning zones at licenced nuclear installations. See:

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<sup>1</sup> <http://www.scotland.gov.uk/Publications/2014/02/8435/2>

<http://news.hse.gov.uk/onr/2014/01/revised-detailed-emergency-planning-zones-principles/>

The revisions to existing DEPZs occur in 2 stages: The first involves a site licensee submitting a Hazard Identification and Risk Evaluation (HIRE) and Report of Assessment (RoA), which a technical team at ONR review. A second ONR team then draw up a DEPZ taking into account the local geography and demographics, to determine a practical zone boundary.

In some areas implementation of these principles appears to progress slowly and NuLeAF officers would be interested to receive feedback from member authorities where DEPZs have been or are being reviewed, to establish whether there are common issues (e.g. resourcing) that need to be addressed.

Barrow is experiencing delays in DEPZ boundary determination, though this pre dates publication of ONR's revised principles, and delays at the Sellafield site appear due to the finalisation of the HIRE. See ONR's third quarter report to the West Cumbria SSG at : [www.hse.gov.uk/nuclear/llc](http://www.hse.gov.uk/nuclear/llc).

## 5. NuLeAF website

The new NuLeAF website is now fully operational. The web address is still [www.nuleaf.org.uk](http://www.nuleaf.org.uk). It became necessary to build a new website as the old one became outdated and the hosting service withdrew support on economic grounds. The work was carried out by Community Action Suffolk and support fees for the new site are considerably less than the original and monies spent will be recouped over a two year period.