

<b>Meeting:</b>	NuLeAF Steering Group, 14 <sup>th</sup> May 2015
<b>Agenda Item:</b>	7
<b>Subject:</b>	An update on Nuclear Decommissioning Authority (NDA) Strategy and Operations
<b>Author:</b>	Philip Matthews
<b>Purpose:</b>	To provide updates on developments in NDA Strategy and Operations

### **Introduction:**

This report briefly updates on:

- Update on NDA Strategies
- Reports on NDA Theme Overview Groups (TOGs)
- Consultation responses

### **Recommendation:**

This report is for noting.

### **Background information**

1. UK strategy for the management of low level radioactive waste from the nuclear industry.<sup>1</sup>
2. NDA strategy 2011-2016.<sup>2</sup>

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<sup>1</sup> <http://www.nda.gov.uk/publication/uk-strategy-for-the-management-of-solid-low-level-radioactive-waste-from-the-nuclear-industry-august-2010/>

<sup>2</sup> <http://www.nda.gov.uk/publication/nda-strategy-effective-from-april-2011-print-friendly-version/>

## 1. Update on Nuclear Decommissioning Authority (NDA) Strategies

Significant work continues on three important NDA Strategies.

Consultation on the nuclear **Low Level Waste Strategy** ended on the 21<sup>st</sup> January. NuLeAF submitted a consultation response<sup>3</sup>. The revised strategy is due to be published in autumn 2015.

An engagement event on **Strategy III** will be held in Manchester on the 19<sup>th</sup> May. The NuLeAF Executive Director will be attending along with a number of local authorities and the Executive Director will report back to the next meeting. The Executive Director attended a meeting on the Strategic Environmental Assessment (SEA) for Strategy III held in Penrith on the 9<sup>th</sup> March.

NDA is also developing a **Higher Activity Waste (HAW) Strategy**. Consultation on this is anticipated in the autumn. James McKinney of NDA spoke to the January Steering Group on the development of the HAW Strategy. Key points of interest raised in his presentation and subsequent discussion were:

- It is important to ensure that the remaining capacity at the Low Level Waste Repository is used to the best advantage.
- The categories ILW and LLW can sometimes be misleading in terms of waste management. Some ILW could be disposed of in the Low Level Waste Repository while a small amount of LLW needs to be treated as ILW. A central element of the HAW Strategy is to ensure that waste has been correctly classified.
- There is a big opportunity to look at 'boundary wastes' i.e. those that just fall into the ILW/HAW categories and consider whether it is possible they have been miscategorised or if they can be moved to LLW category through treatment.
- Consideration will be given to consolidation of stores.
- There will be greater focus on alternative waste treatments.
- A national 'Best Available Technique (BAT) strategic position will be developed for certain waste types and groups.

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<sup>3</sup> <http://www.nuleaf.org.uk/document-library/consultation-responses/consultation-responses-2015>  
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## **2. Reports on Nuclear Decommissioning Authority (NDA) Theme Overview Group meetings**

NDA convenes four Theme Overview Groups (TOGs) to facilitate NDA strategy implementation. NuLeAF has representation on three of these groups covering Site Restoration (SR), Integrated Waste Management (IWM), and Critical Enablers (CE). NuLeAF also received update reports from the fourth TOG, on Nuclear Materials/Spent Nuclear Fuel (NM/SNF).

Since the last Steering Group in January there have been a number of meetings of the TOGs.

### **2.1 Site Decommissioning and Remediation Theme Overview Group (SDR TOG)**

The Site Restoration TOG has now been renamed the Site Decommissioning and Remediation TOG. The name change is on the grounds that not all sites will be fully restored to their pre-nuclear condition.

The SDR TOG met on the 3<sup>rd</sup> March and the 14<sup>th</sup> April. Much of the discussion was on the **Site Decommissioning and Remediation Theme in Strategy III.**

It was recognised that there was a challenge to NDA in how funding for decommissioning is dealt with, as future spending reviews may constrain spending to a degree which could impact on the end dates for decommissioning and remediation.

NDA are therefore clear that in the current funding environment there is no appetite for setting specific end dates; however aspirational targets can be reflected through the inclusion of current Lifetime Plans (LTPs). The issue of how the pace and priority of decommissioning will be addressed will be explored in Strategy III along with the scope for 'spend to save'. The Strategy will include a case study on 'spend to save' work at Dounreay.

In terms of **Site End States** there will be little change from Strategy II. However there was recognition that the Site End States may change over time and a reluctance on the part of the NDA to constantly revisit site end states. NuLeAF highlighted the concern of members that this uncertainty on site end states was causing, and the need for clear engagement with local authorities and communities. Kim Baines of NDA will be present at the Steering Group and there will be scope during the discussion on Proportionate Regulatory Controls to explore some of these issues.

The April meeting also included a discussion on a proposed update to the NDA **Value Framework**. It is proposed that the Value's Framework covers 6 topics:

- Safety
- Security
- Environment
- Hazard Reduction

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- Socio-economics
- Cost

The revised Framework is intended to be aligned with Treasury Guidance on option appraisal and will be used to evaluate different options as part of the decision making process. It is also recognised that stakeholder engagement must be an important part of how the Framework is applied.

Once the revision to the Framework is approved, it is intended to produce an 'easy access' guide to it as well as a more formal technical guide. NuLeAF and member authorities have in the past expressed concern at the lack of clarity as to how the Framework is used. It must be hoped that this revision and the associated guide will provide some clarity.

## **2.2 Integrated Waste Management Theme Overview Group (IWMTOG)**

The IWM TOG met on the 5<sup>th</sup> March. As with the Site Decommissioning and Remediation TOG, much of the discussion was on issues related to Strategy III.

Key discussion points on Strategy III were:

- The need to ensure the availability of robust and sustainable waste management infrastructure
- That the IWM theme of Strategy III should include a statement that the prevention and minimisation of waste was a key factor in considering the need for new waste facilities.
- That the IWM Theme should seek to address the scope for integrating the management of Higher Activity Waste (HAW) and Low Level Waste (LLW).
- That the Strategy should include a commitment to prompt disposal wherever practical.
- That there needs to be a clear statement on how the IWM Theme will interface with the Spent Nuclear Fuels and Nuclear Materials Theme.

It was also proposed that Strategy III should commit the NDA to assessing the benefits of developing an integrated radioactive waste strategy.

## **2.3 Critical Enablers Theme Overview Group (CETOG)**

A Critical Enablers TOG meeting was held in Penrith on the 10<sup>th</sup> March. It included updates on a range of topics.

Unfortunately, as Bill Hamilton was unable to attend, there was no update on Socio-economics, the issue of most interest to local authorities.

A paper on the **development of the NDA's supply chain** was presented. This defines a strategic objective of ensuring that *'the Supply Chain available to the NDA Estate is optimised to enable a safe, affordable, cost effective, innovative and dynamic market for clean-up and decommissioning, and for the NDA Estate to be seen as a Client of Choice.'*

Of interest to NuLeAF members are commitments to:

- Provide leadership and support for initiatives to improve the ease of entry and participation into the NDA portfolio, improve the consistency of processes and applications, decrease the risk of inappropriate contraction of the market to support necessary supply chain capability and capacity, seek opportunities to optimise assets, and foster a learning culture across the estate.
- Assist Small and Medium Enterprises (SMEs) by requiring the NDA estate to provide information on smaller packages of work (as a minimum £50k - £100k) in Procurement Plans and to publish annual statistics regarding the value of work sub-contracted by each SLC, the percentage of Tier 2 contracts that are let competitively, SME spend and other relevant data to increase transparency.
- Promote responsible (including socio-economic/ethical and/or sustainable) procurement policies across the NDA estate, including where appropriate, the use of prequalification/tender assessment criteria, specification requirements and whole life costing principles to support these policies.
- Create and maintain suitable forums to directly engage with all tiers of the supply chain and other key stakeholder groups.
- Explore synergies with other Nuclear Clients and seek to coordinate Supply Chain development programmes recognising the inter-linkages between Supply Chains across the sector.

A paper on the evolving **Technology Innovation Strategy** was also submitted. The objective of this strategy is to support a culture and environment that enables relevant cost effective technical innovations to be realised on a timely basis across the NDA estate, thereby delivering safe and cost-effective decommissioning and reducing risk. The paper set objectives for supporting innovation. SLCs will be required to define and implement their own innovation strategies and the NDA will collaborate with the UK Government's vehicle for innovation, Innovate UK, on estate-wide calls for innovation applicable to nuclear decommissioning.

### **3. Consultation responses**

NuLeAF has recently submitted responses to the consultations on:

- Nuclear LLW Strategy review<sup>4</sup>
- CoWRM Triennial Review<sup>5</sup>
- ONR consultation on decommissioning at Imperial College<sup>6</sup>

All are available on the NuLeAF website (see below).

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<sup>4</sup> <http://www.nuleaf.org.uk/wp-content/uploads/2015/04/LLWStrategydraftResponsefinal.pdf>

<sup>5</sup> <http://www.nuleaf.org.uk/wp-content/uploads/2015/03/NuLeAF-response-to-CoWRM-Triennial-Review.pdf>

<sup>6</sup> <http://www.nuleaf.org.uk/document-library/consultation-responses/consultation-responses-2015>