

**Draft Note of Second Annual Meeting with Waste Planning Authorities, NuLeAF, Nuclear Industry and Waste Management Supply Chain to discuss low level waste, metallic, combustible and VLLW diversion forecasts and routes.**

**2 September 2015, London School of Economics, 1.30 – 3.30.**

*Attendance:*

Jane Cory – Cumbria County Council  
Adrian Lynham – Cumbria County Council  
Mike Garrity – Dorset County Council  
Rob Scott – EnergySolutions  
Lesley Stenhouse – Essex County Council  
Greg Smith – FCC Environment  
Rob Sellen – Hampshire County Council  
Jo Baker – Kent County Council  
Craig Ashton – LLWR  
Cath Giel – LLWR  
Hannah Kozich – LLWR  
Tim Bond – Magnox  
David Loudon – NDA  
Phil Watson – Northamptonshire County Council  
Phil Matthews – NuLeAF  
Catherine Draper – NuLeAF  
Trevor Brown – Oxfordshire County Council  
Richard Conway – Purbeck District Council  
Charles Mason – Sellafield  
Ed Best – SITA  
Guy Robinson – Somerset County Council  
Lisa Price – South Gloucestershire Council  
Craig Broadbent - Studsvik  
Chris Jolliffe – Tradebe  
Andrew Ball – Veolia  
Chris Westwood – Veolia  
Matt Meldrum – West Berkshire Council

## **1. NuLeAF welcome, introductions and context for meeting**

1.1 PM opened meeting and welcomed those attending. He noted that there had previously been a concern in some local authorities that there was not sufficient early engagement between the industry and local authorities, as required by the Low Level Waste Strategy. This had led LLWR commissioning NuLeAF to look at ways in which this could be resolved and this meeting was one of the suggestions made.

1.2 Attendees introduced themselves and PM handed the meeting over to Cath Giel to Chair.

## **2. Waste treatment services trending of actuals against forecasts to date**

2.1 Craig Ashton of LLWR gave a presentation (see Annex A) on the Waste Treatment Services offered by LLWR.

2.2 CG then provided background to the development of the Waste Treatment Services offering at LLWR. In 2008, LLWR was the only disposal facility for LLW in the UK. Vault 9 was behind schedule and space in Vault 8 was very limited. The whole emphasis was on disposal and the waste management hierarchy was not being applied. With the appointment of a new PBO for LLWR the emphasis was changed. The waste management hierarchy is now being successfully applied and almost 90% of waste is now diverted away from disposal at LLWR. Other services have been set up around the UK and waste is being diverted there for treatment or disposal. Vault 9 was built on time and under budget. The permit for disposal in Vault 9 will be issued soon and a planning application to Cumbria County Council for future development will be submitted shortly.

2.3 There is no capability to melt radioactive metals in the UK and currently metallic waste is sent to other EU countries for smelting, though there is contractual capability to send to the USA should it be necessary. A new metals framework is being developed and an invitation to tender to re-compete the metallic framework will be issued in September 2015.

2.4 All wastes suitable for incineration can be dealt with within the UK.

2.5 VLLW – there are now three facilities which can take VLLW for disposal and this is proving very useful in freeing up capacity at the LLWR.

2.6 Looking ahead a revised commercial framework is also being developed which will cover transport packages.

2.7 There will also be more focus on higher hazard or higher complexity projects within LLWR's Waste Services organisation. LLWR is adapting itself to its customers' needs. It is being asked to innovate, especially in order to deal with higher hazard wastes.

2.8 In response to a question CA stated that at this stage it was unclear whether any of the changes discussed would require changes to planning or permitting. However, the wastes are consistent with the LLWR environmental safety case, being at the higher end of the LLW classification (it is not HAW).

## **3. Individual SLC's interpretation of 5 year Joint Waste Management Plans (JWMP), trends to date and forecasts for the next year**

### ***Magnox***

3.1 Tim Bond gave a presentation on behalf of Magnox (see Annex A).

3.2 There has been a new target cost contract since 1 September 2014 with the new Parent Body Organisation (PBO) – Cavendish Fluor Partnership.

3.3 The current version (JWMP8) was provisional, pending Lifetime Plan revisions to align with new aspirations of the new PBO. JWMP9 is being prepared for issue in September 2015.

3.4 Current focus is on the integration of RSRL and Magnox and knitting together the different systems.

3.5 The SMART inventory is being implemented in Harwell and Winfrith and work is being done to improve the waste inventories. The intention is to standardise waste characterisation across all sites.

3.6 The focus is now on problematic waste (those for which there is no solution yet) and opportunity wastes (which can be moved up the waste hierarchy with treatment).

3.7 The change to a target cost contract for the PBO has had a big impact with funding significantly down on previous years. Where opportunities offered by the supply chain are proving too expensive other options are being investigated.

3.8 The company is proud that it has been able to accelerate decommissioning work and at the same time drive down the volume of waste being sent to LLWR.

3.9 In response to a question TB confirmed that should routes for disposal of LALLW dry up then the BAT would be re-evaluated and the next best option explored. A key mitigating factor would be whether or not VLLW/LALLW could be used around the estate i.e. in the profiling for the cap on Vault 8. Threats and risks to the UK market are considered, and when they become so significant that there is the need to take action, other options will be considered.

3.10 HK said that the environmental regulators often talk about how they can encourage other suppliers to enter the market to improve application of the proximity principle. She believed that EA has been reviewing their permitting process in order to understand what they can do to make the process more straightforward and to encourage new entrants to market. A current barrier is the perceived complexity of the planning and permitting processes.

3.11 CG confirmed that as a result of an exercise conducted around the national programme of waste arisings it had been established that there was sufficient physical capacity for VLLW in the near term. This was obviously dependent upon sites securing the necessary planning and permitting permissions.

3.12 HK highlighted that early waste characterisation allows you to make an estimate in your forecast, but when you come to decommissioning you used more detailed characterisation methodologies. As a result it can sometimes transpire that forecast arisings aren't correct and the inventory changes. The better you understand your waste the better you will know your requirements. Industry is getting better at characterisation and understanding what they have and what facilities they need.

3.13 As prices for services increase, BATs are being re-evaluated and some quite big cost differences with certain types of waste treatment processes are being seen. This will mean that consideration should be given as to whether the waste should be diverted to an alternate route, though consideration must be given to the health of the market.

### ***Sellafield***

3.14 Charles Mason gave a verbal presentation on the situation at Sellafield.

3.15 Onsite disposal facilities are forecast to reach capacity in the early 2020s and consideration is being given to developing further on or near-site capability. To do this, we need to understand the end state of the site better.

3.16 Waste characterisation work is being carried out, and whilst it is currently in early stages it is expected that volumes will go down.

3.17 Waste plans for each site are available on the LLWR website. These are driven by the waste management hierarchy. Sellafield is trying to manage its waste more effectively and provide support for the staff in doing this. At one time all LLW was sent to LLWR, now 85% of that has been diverted to other routes.

#### **4. Supply chain actual volumes and how this supports future business plans**

4.1 Craig Broadbent gave an overview on behalf of Studsvik. 1000te of metal had been processed last year and 600te so far this year. This represents quite a decline in volume and will have cost implications. Planning and predictability of arisings is an issue. The cost of treatment is fairly fixed which means as tonnage goes down the price of treatment goes up in order to ensure the facility remains viable. Studsvik is looking at how it can maintain operation in a declining market.

4.2 Chris Jolliffe gave an overview on behalf of Tradebe. The company operates 2 sites, Fawley waste incinerator and they are also a tenant at Winfrith. They offer a variety of services to help meet the waste hierarchy. Tonnage of waste is important as that is what allows reinvestment in the industry and drives innovation. An example of this would be the re-characterisation of wastes from ILW to LLW because the tritium content has been treated. It is important to work with Site Licence Companies in order to understand their needs now and in the future.

4.3 In response to questions, CJ confirmed that Tradebe also dealt with NORM wastes at a facility near Aberdeen, and that waste shipments were brought in to Fawley from abroad. The inclusion of wastes generated from outside the UK sometimes made a waste treatment facility in the UK viable. The Winfrith facility provides supercompaction and decontamination of metals through abrasive or chemical treatment. 500te of treated metal have been returned to the open market. Ion exchange resin sludges produced by nuclear power stations are also treated and waste characterisation carried out.

4.4 In response to questions CB said that they were unable to deal with metal waste shipments from abroad at their facility as the planning permission did not permit this. The cost of treating metals is not greatly affected by the metal price market – the cleaning up of the metal is the expensive part of the business.

4.5 Rob Scott gave an overview on behalf of EnergySolutions. They are an American company and are across all 3 frameworks within LLWR. They provide metal recycling using facilities in Germany and USA. They also work with Tradebe Inutec, and with Grundon on combustibles at a facility near Heathrow.

4.6 Andy Ball gave an overview on behalf of Veolia. The company is involved in water management, energy management and environmental waste management. They have a facility for incineration of LLW at Ellesmere Port. Their main operations are in France and they have only been active in the UK radioactive waste market for a short while.

4.7 Greg Smith gave an overview on behalf of FCC Environment. The company operates the LLW landfill site at Lillyhall in Cumbria. The site is permitted to take a lower radioactivity level than others and so is restricted as to what wastes it can bid for. The drop off in waste arisings from commercial and municipal routes is a concern for the company as this could make the site unviable.

4.8 It was generally agreed that the reduction in waste arisings posed a challenge for operators and the supply chain. It is important that they continue to work together to ensure that waste treatment and disposal routes are available over the next 100 years.

## **5. NDA update on the revised LLW strategy**

5.1 DL gave an update on progress of the revised LLW Strategy (see Annex A). There had been four broad themes to the consultation: strategy integration, risk based waste management, recycling and reuse and stakeholder engagement.

5.2 Strategy integration: there had been quite a lot of support for the integration of nuclear, non-nuclear and NORM strategies.

5.3 Risk based management: this had been broadly supported, recognising that this was the approach taken in many European countries. NDA recognises that there needs to be appropriate stakeholder engagement if there is any change of approach.

5.4 Recycle and reuse: there was broad support for the application of the waste hierarchy, but the fragility of the market was also recognised.

5.5 Stakeholder engagement: the importance of stakeholder engagement in the implementation of the Strategy was recognised.

5.6 Following consultation DECC was reviewing the revised Strategy and publication of the final document was expected in early October 2015.

5.7 In response to a question DL confirmed that there were no substantive changes in the revised strategy. However, it had become apparent from the discussions today that consideration must be given to supporting the supply chain and that this would be done during the next implementation phase of the strategy.

5.8 In response to concerns about how the strategy would be recognised in the planning regime HK confirmed that the new strategy will be published and branded by DECC rather than NDA.

## **6. Local authority general updates**

6.1 Essex County Council: work is being carried out on the Waste Local Plan. The consultation document was sent to Cavendish Fluor Partnership and responses were received from NDA and Magnox. About 1000 comments and 500 responses were received which are being reviewed. The next stage is to produce the pre-submission document.

6.2 Cumbria County Council: consultation has been carried out on a new Minerals and Waste Local Plan. Since the consultation closed new proposals have come forward and a new consultation on the minerals sites proposed will be carried out. A Draft Plan will go to Cabinet towards the end of 2015 with the view of the Inquiry taking place in early 2016. Cumbria County Council is awaiting the submission of a new planning application for additional vaults at the LLWR. They hope to respond to the Environmental Impact Assessment shortly. A Deed of Variation on the Planning Performance Agreement with Sellafield is in hand, and they have also met with NuGen regarding the consultation on the proposal for constructing a new nuclear power station at Moorside.

6.3 Oxfordshire County Council: the current Minerals and Waste Plan dates from 1996 and despite there being two nuclear licensed sites within the Council's boundaries it does not contain any policy on radioactive waste management. A pre-submission document on a new Minerals and Waste Plan has just been issued and is out for consultation until the end of

September. This contains a general policy on radioactive waste management and a site specific policy for Harwell and Culham. Depending on the consultation responses, the aim is to submit it for examination towards the end of the year, with the examination taking place in late February – March 2016 and adoption in 2016.

6.4 West Berkshire Council: they are in the early stages of updating their Waste Plan and further consultation will be carried out later this year. Policies on radioactive waste management will be included. There may be a significant impact on the Plan if either Aldermaston or Burghfield is chosen as the storage site for the Reactor Pressure Vessels from decommissioned nuclear submarines under the Submarine Dismantling Project being run by MoD.

6.5 Northamptonshire County Council: a full review of the Minerals and Waste Local Plan is being carried out. The first draft will go out to consultation towards the end of 2016. A partial review has already been carried out which resulted in the incorporation of radioactive waste management policies. Northamptonshire County Council has also been taking an active role in ensuring that other local authorities include radioactive waste management policies in their Local Plans by commenting on their consultations. The East Northamptonshire Resource Management Centre is located within the county. Augene did not apply for a lifetime extension to the site when the opportunity arose during the call for sites. There will be another opportunity for them to do so in 5 years' time. The site is currently permitted to 2026.

6.6 Somerset County Council: the evidence base for the Waste Local Plan is currently being updated. Somerset's Waste Core Strategy was adopted in 2013. The planning team is currently in dialogue with Magnox on the changes to the management of FED and ILW which have arisen since the change of Parent Body Organisation in 2014. They are awaiting the outcome of the trial of pond skip milling. The importation of radioactive waste from outside the county is a contentious issue.

6.7 Kent County Council: work on the Local Plan is fairly advanced with the consultation open until 12 October. It includes policies on radioactive waste management.

6.8 South Gloucestershire Council: Waste Policy was adopted in 2014, and Sites and Places Plan is currently being prepared and going through Regulation 19 consultation. It includes specific policy on new nuclear build and decommissioning at Oldbury. A list of 'asks' is included, and this received support at the consultation stage. Submission is expected at the end of the year.

6.9 Dorset County Council: our Waste Plans are produced with Bournemouth and Poole. A Draft Waste Plan is currently out to consultation, it included policies on waste treatment and also on restoration with a view of assisting Magnox. It permits treatment of radioactive waste from Dorset and where a case can be made from outside the county. Comment from Magnox and Tradebe would be welcomed.

6.10 Purbeck District Council: we are working closely with Dorset, feeding into their policies.

6.11 Hampshire County Council: our Waste Plans are produced with the New Forest National Park and Portsmouth City Council. Public consultation has just closed on the draft Supplementary Planning Documents on Oil and Gas Development and Minerals and Waste Safeguarding. A report will be published once the responses have been reviewed. The Council has also developed a coastal pollution strategy.

6.12 PM commented that the number of local authorities now including radioactive waste management policies within their Local Plans has significantly increased. They define priorities for each site, but also give clarity to industry.

6.13 In response to a question from CG, DL confirmed that he collated NDA responses to consultations. He noted that the policies were generally supportive of NDA's aspirations, if there was justification.

It was agreed that the meeting was useful as it gave the opportunity for the participants to understand each other's point of view and to discuss issues. A further meeting would be held in 2016.

The meeting closed at 3.30.

## **Annex A: presentations by LLWR, Magnox and NDA**



LLWR presentation



Magnox presentation



NDA presentation