

Draft Note of the Meeting of the NuLeAF Radioactive Waste Planning Group meeting, 15th November 2017

Present:

Steve Smith	Copeland District Council
Phil Greenup	Cumbria County Council
Terry Burns	Essex County Council
Linda Townsend	Gloucestershire County Council
Phil Watson	Northamptonshire County Council
Dave Illsley	Shepway District Council
Doug Bamsey	Sedgemoor District Council
Sarah Povall	Somerset County Council
Gillian Ellis-King	South Gloucestershire Council
Lisa Chandler	Suffolk Coastal District Council
Catherine Draper	NuLeAF
Philip Matthews	NuLeAF
Simon Boniface	NDA

1. Welcome and introductions

1.1 PM welcomed people to the meeting and around the table introductions were made. Apologies were received from Charlotte Rushmere, Dorset County Council, Bryan Geake, Kent County Council and Peter Day, Oxfordshire County Council.

2. Minutes of the last meeting

2.1 Had the feedback given by RWPG been implemented by RWM on the design of the geological survey section of the website? PM had met with RWM the previous day and they had said they would like to meet with the group again to discuss the website further.

2.2 Did the meeting with DCN take place, and will there be a publicity campaign amongst non-nuclear authorities. PM said that he had met with DCN along with BEIS and RWM. It was fair to say that knowledge of the GDF was fairly low amongst local authorities outside NuLeAF. RWM wish to develop their contact with DCN. NuLeAF has invited DCN to attend the workshop in December, but no response has yet been received.

3. Matters arising

3.1 Comments had been received on the proposal for a database of planning applications, and a pro-forma template had been suggested. CD would now mail round with the template and set up a closed Knowledge Hub group

Action: CD

3.2 Had there been any further indication from Juliet Long on the progress of her review of UK radioactive waste policy and infrastructure? CD read out an email received from JL stating that the work she had undertaken was for an internal government review, and that should there be an appetite to take the work forward there would be further opportunities for engagement. PM said he would write to JL asking for an update ahead of the December SG meeting.

Action: PM

4. Discussion with Simon Boniface, NDA regarding proposals for accelerated decommissioning of Magnox reactors

4.1 PM welcomed Simon Boniface to the meeting.

4.2 SB introduced his presentation on NDA's work to consider whether a case can be made to change Magnox decommissioning strategy- from one of deferral to that of continuous – to HMG. Current UK strategy is for sites to go through a high hazard reduction phase (removal of fuel) and for the site to be prepared for a period where it can be safely left for the radioactivity in the reactor to decay to a level where it will be 'safer' to decommission. Notionally the GDF will be available from the 2040s which would mean there would be a waste route for the High Activity Waste available without having to interim store, and this strategy also benefits from the discounting of costs.

4.2 1 However, there have been changes since this strategy was adopted. In many respects the dominant hazard during reactor decommissioning is actually asbestos and other conventional hazards and not radiation. There have also been significant advances in remote technologies and so there is reduced benefit in waiting for radioactivity to reduce. The UK has not fully dismantled a Magnox reactor and so there is huge learning to be had. If we delay (i.e. keep the current strategy) we potentially lose out on our Supply Chain being able to compete on the worldwide market for remote decommissioning and would not be able to capitalise on being first.

4.2 2 Historically, the nuclear industry has been conservative in its estimates of the volume and radioactivity levels of the waste it has. Recent data indicates that dose levels in some parts of a Magnox reactor are up to 2 orders of magnitude lower than those predicted. New waste routes are being developed for LLW, and waste disposal itself is better managed than at the time the current strategy was adopted. This allows for the better use of existing storage facilities and their increased longevity.

4.2.3 If there was a change in strategy to permit continuous decommissioning, work currently programmed to prepare sites for a period of quiescence could be avoided and the costs saved.

4.2.4 NDA Strategy 3 stated that NDA was going to review the extant strategy, and to that end NDA asked Magnox to review, consider credible options and then a preferred option. Magnox have completed this work and NDA is taking the output and developing by applying a UK perspective. NDA is now producing the case to take to government to support change in strategy. Two papers will be submitted: the timing paper will be submitted in June 2018, with the sequence paper following approximately two months later.

4.2.5 There were 10 main factors which SB felt could influence the case for a change of strategy – the Timing of dismantling:

1. Lead and learn – all the reactor designs are different, but there is an optimal order to learn from experience. This factor also applies to the Sequence.
2. Supply chain – there is no longevity of work within the Magnox fleet for the supply chain under the Care and Maintenance approach. If the strategy changed to continuous decommissioning, skills and experience would be preserved within the workforce. It would also make the supply chain more competitive in a global market.
3. Early clearance of sites could release them for other uses.
4. Knowledge of the condition and layout of the site is maintained.
5. Long term view of staff requirements, avoiding loss of skilled staff
6. Greater investment in UK 'nuclear' skills, driving efficiency and ability to develop business within UK or abroad
7. Support BEIS Industrial Strategy
8. Greater confidence in UK nuclear overall – more likely for investment and support for new missions
9. AGR and Magnox synergies
10. Ageing of plant, asset condition. Minimise spending associated with 'standing still'.

4.2.6 The factors that most influence the sequencing of reactor dismantling include:

- Waste management, interim storage or other disposal options
- Synergies with AGR decommissioning
- Calder Hall (whether to bring into pool for decommissioning to facilitate work at Sellafield)
- Lead and learn from one site to another
- Affordability, lifetime costs
- Local factors – impact on particular sites e.g. loss of employment opportunities in Trawsfynydd
- New missions – new for old
- Management of ageing

- Resources and ability to deploy

These factors can be viewed as 'lenses' through which the case for decommissioning a site can be viewed. Depending upon which 'lens' is considered most important would change – for example – a sequence. Different stakeholders are likely to have different perspectives on each lens. Some sites viewed through some lenses will move up the hierarchy for decommissioning, but viewed through other lenses their priority will decrease. NDA needs to be able to demonstrate the rigour of the criteria with which each site is critiqued and rated, and that the criteria have been applied consistently.

4.2.7 SB went through the next steps for NDA. They are:

- taking the work done by Magnox and turning into a case for change to present to government;
- examining the timing and sequencing separately to prepare papers to submit to government;
- gathering numerical data to underpin the Magnox work, particularly waste generation rates, package requirement and plant ageing effects
- looking at Strategic Enablers:
 - Supply chain, benefits and disbenefits, UK plc contribution
 - Maintenance of sufficient knowledge and skills
 - Savings with continuous approach (no start/stop, efficiencies)
 - Enabling other missions i.e. release land earlier
- considering whether Calder Hall (A former Magnox station but part of the Sellafield site, and therefore not part of the Magnox 'estate') should be included in the programme to enable release of land at Sellafield;
- looking at the relationship between 'A' Magnox and 'B' AGR station, and how decommissioning an 'A' station at certain locations could influence/assist the decommissioning of 'B' stations.
- seeking stakeholder views – what is important? Early and on-going discussions with SSGs/NuLeAF and local authorities
- developing a detailed stakeholder engagement plan to support both Timing and Sequencing phases.

4.2.8 Wrapping up his presentation, SB said that the current strategy wasn't optimal; any new strategy would be constrained by funds and resources which will mean that we could not do more than between 1 and perhaps 3 sites at any one time;; NDA will not be looking to develop the entire sequence of decommissioning as factors may change as lessons are learnt from actual decommissioning; stakeholder views on what matters most need to be considered and this will be used to inform both the case for change, the strategy and which site/s would be accelerated.

4.3 Points raised in discussion:

4.3.1 *Q: If decommissioning is accelerated at one site, does this mean that the others go slower?*

A: Work which would have been carried for a site to go into Care and Maintenance may not go ahead. Activities between 2032 and 2064 (the period of quiescence) will change. Sites would be maintained safe until their turn for decommissioning.

4.3.2 Q: *Given that the GDF will not be available when this programme starts, where will the HAW go?*

A: We are running a separate project on this issue. It could be on-site (interim) storage.

4.3.3 Q: *What will happen to the asbestos from the site?*

A: One of the drivers for change is to make use of extant waste routes – and those include asbestos routes to landfill. Longer term I believe that technological solutions such as melting will need to be employed. My preferred method would be for thermal treatment. This has been used in France to good effect. The asbestos is bagged and melted on-site. The end product is a glass product which is then crushed and used as a base for roads.

4.3.4 Q: *If early decommissioning of a site may mean that it would be eligible for use as a site for new nuclear build, you need to have discussions with promoters soon as they have their own timelines they are working to. Also, there may be issues with new build sites and the appropriateness of having decommissioning taking place at the same time as new build, both in terms of impacts locally and the availability of workforce?*

A: It was recognised that for some sites there could be a benefit in releasing land for new build. The sequence may change with the decommissioning of each reactor which means it is not practical to commit to a timeline for new build promoters.

4.3.5 Q: *Decommissioning of the AGR fleet is only 10 years away, but we are well aware that there is a lack of synergy between decommissioning and currently operating sites.*

A: Currently the Nuclear Liabilities Fund will be used for decommissioning AGR stations. The government does have the option to take back the stations at the end of their life and take over responsibility for decommissioning although this question is complex and extremely sensitive.

4.3.6 Q: *Will the selection of sites for decommissioning be an internal process, or will you invite sites to come forward to make a bid?*

A: NDA will need to demonstrate that whatever sequence it ends up with can be rigorously tested and defended. We will use our engagement with stakeholder to make the process transparent and to help us understand the issues for stakeholders.

Comments from group: it is important that the information is presented in a way that explains the implications for all the sites, as well as the local point of view. It is such a fundamental change from the current approach that the engagement needs to be comprehensive and in-depth, and should show the relationship and impact for AGR and nuclear new build as well. You need to show how this new approach has evolved from the current. NuLeAF can assist you in preparing for your meetings with SSGs by giving you an overview of relevant strategic issues for each area. This

is also useful in informing the local authorities in understanding the range of issue that are important to the community around each site. However, there is also a need for NDA to contact directly with the host council for each site, in order to understand relevant issues including the planning perspective. NuLeAF can provide relevant contacts.

4.3.7 Q: *Why is the timing paper being submitted in advance of the sequencing paper?*

A: Our priority is to get government thinking about the move away from the Care and Maintenance approach, and therefore we are looking to 'bank' a change in strategy first.

Comment: you are returning to the Steering Group meeting in December to speak to elected members. It would be helpful if we could receive an outline of the Comms strategy in advance.

4.3.8 Q: *Will you be sharing your Comms strategy?*

A: Yes, at present it isn't fully developed, but we will share it at a later date.

NuLeAF members offered to provide comments to help NDA in framing this document.

4.3.9 Q: *How does this change in strategy fit in with other work programmes such as the Integrated Waste Strategy?*

A: The success of accelerated decommissioning will hinge on the availability of waste streams, therefore the Integrated Waste Strategy is integral to this programme. Work currently being carried out on interim storage solutions and near-surface disposal will conclude in June 2018.

4.3.10 Q: *How long do you expect it to clear a site?*

A: It should be possible to clear a site in 5 years.

4.4 PM thanked SB for coming to the meeting.

4.5 The group agreed that NuLeAF should write to SB before the December SG meeting outlining the issues so these could be addressed at the meeting. Draft letter to be circulated to meeting prior to sending.

Action: PM

5. Update on national developments in radioactive waste management

5.1 PM went through the paper which had been circulated prior to the meeting.

5.2 Regarding the review of NDA transport strategy, the meeting asked for clarification on the timeline, and if practical a speaker be invited to a future meeting.

Action: PM

6. Update on Geological Disposal Facility siting process

6.1 PM went through the paper which had been circulated prior to the meeting. The consultations on working with communities and land-use planning had been further delayed, although government had signalled its intention that the launch for the siting process remained summer 2018.

7. Site updates

Copeland: Local Plan is in mid-consultation. A major topic of interest for the council is the Sellafield Transformation Plan which outlines the approach they are taking to their future work following the cessation of reprocessing on site. There is the potential for 3000 jobs to be taken out of the community. Sellafield has committed to no redundancies through employing those affected in other roles on the site. However, many of the jobs attracted an overtime allowance which will no longer be payable. There has been a programme of industrial action by unions over the past few weeks over terms and conditions of employment. Sellafield management are endeavouring to reduce costs. Planning applications are being submitted, and Sellafield is working with Copeland BC and Cumbria CC on a masterplan for the site.

Following a change in councillors, we have also recently taken the opportunity to update the elected members on nuclear issues, and we are likely to be preparing updated position statements in the coming months.

The LLWR PBO will be notified in December whether or not they will have a third term. The work done there has been very well received, and they have a good relationship with the local community so it would be unusual for a third term not to be given.

Cumbria: The Local Plan has been adopted. We are trying to get a more strategic relationship with Sellafield. Agreement has been reached that an overall masterplan should be produced for the site, to provide the context for individual proposals.

Suffolk Coastal: The Local Plan review has ended. A new policy on energy infrastructure has been suggested. We now have a nominated contact at Sizewell A, and am being kept up to date through him on their work. A new application is about to come in for security fencing, and we have received prior notification for demolition of six things across the site. We have also arranged a meeting with all the bodies looking to get their energy infrastructure located in the Sizewell area. We too hope to get a masterplan for the area.

Essex: Waste Local Plan has been adopted. A 12 month extension to the LLW store was approved. Essex were expecting ILW from both Dungeness and Sizewell in line with Strategy III and the County's recent approval of the proposal.

Somerset: Two applications have been approved for storage and encapsulation of ILW, with conditions attached forbidding the importation of waste. Magnox now wish these conditions to be removed. The pre-application letter has been received outlining their approach. An EIA was not required for the original applications but will be required now. The drip, drip approach of making planning applications is frustrating.

Northamptonshire: The revised Local Plan was adopted in July. There were no substantial changes in policy. There has been no communication with Augean lately.

South Gloucestershire: The Policies, Sites and Places Plan has been adopted, including policy in relation to NNB. Magnox had, at Examination, asked for a decommissioning policy, but it was currently unclear what the objectives or scope of such a policy would be. A commitment was therefore given to work with Magnox to review the need for a decommissioning policy in the new plan. An initial meeting has been held with Magnox and preliminary thoughts are that there could be a suite of nuclear related policy, including for 1. NSIPS, 2. new build at Oldbury, 3. a new decommissioning policy, and 4. a radioactive waste policy (separated out from the current adopted Core Strategy policy). SGC has met with Charlotte Rushmere from Dorset to discuss issues relating to the Magnox approach of submitting a series of individual planning relating to various aspects of decommissioning, but without the LPA having an understanding of the overall strategy for the site. Consideration is being given to asking for an overall planning strategy/masterplan for the site. An early consultation on issues relating to a decommissioning and radioactive waste policies is planned for early next year. SGC hopes to circulate the draft to this group for comment in advance of this.

Shepway: We have four applications "live" with the Magnox socio-economic scheme. Apart from difficulties in submitting information using the online portal which works poorly at times, we would encourage people to make applications to the scheme, as we have had positive results.

Gloucestershire: The most recent planning application was for the encapsulation plant, this went through on delegated authority. The SSG were interested whether there would be any community benefit associated with the application. There was an application for a variation earlier in the year which allowed the importation of materials from Oldbury to go into the ILW store. Our Waste Core Strategy contains no policies relating to nuclear decommissioning.

8. Date of next meeting

The next meeting will be held at Coram Campus on 24th January 2018.

9. Any other business

9.1 PM had met with Ben Lewis who was undertaking work on behalf of NDA on EIA and planning applications. Ben may be able to attend a future meeting to discuss this with the group.

9.2 Charlotte Rushmere from Dorset CC had asked for comments from the group on EIA for decommissioning, and had attached a copy of the draft policies which had been circulated to meeting attendees late the previous day. Dorset is in receipt of a series of individual planning applications and proposals but without the overall context of a masterplan for the site. This leads to difficulties with cumulative impact assessment. As the meeting was unclear on what it was Charlotte was actually seeking an opinion on the meeting asked the secretariat to seek clarification from Charlotte and then circulate a query by email for response.

Action: CD

9.3 There was a brief discussion on the merits of having a planning strategy/masterplan for each legacy site. It was agreed that piecemeal proposals and applications relating to decommissioning are an issue shared by a number of host authorities, and that a joint view on the benefits of a masterplan approach for sites could be beneficial and helpful when discussing decommissioning proposals with site operators.

Actions

15th November 2017			
	Action	By	Outcome
	Post note of previous meeting on website	CD	Done
3.1	Circulate pro-forma template for planning applications	CD	
3.1	Set up closed Knowledge Hub group	CD	
3.2	Write to Juliet Long asking for update on review of UK radioactive waste policy and infrastructure before December SG meeting	PM	
4.5	Write to SB ahead of December SG meeting outlining issues. Circulate draft to meeting before sending.	PM	
5.2	Clarify timeline for NDA transport strategy review	PM	
5.2	If appropriate invite speaker on transport strategy to future meeting	PM	
9.2	Seek clarification on issue from Charlotte Rushmere and circulate to meeting	CD	