

ITEM 6: UPDATE ON NATIONAL DEVELOPMENTS IN RADIOACTIVE WASTE MANAGEMENT

Report to RWPG, 23rd April 2020

This report provides an update on recent developments in radioactive waste management. It covers:

- NDA Update;
- NDA Strategy 4;
- Sellafield Permit Variation;
- BEIS Update;
- Lillyhall landfill site; and
- Submarine Dismantling Project (SDP).

1. NDA update

1.1 The NDA has taken a range of measures to respond to the Coronavirus pandemic.

At Sellafield a controlled shutdown of the Magnox reprocessing plant has taken place and there has been a pause in any work that does not directly impact on safety and security. This has allowed many staff to work from home and limit the number of workers required on site. A similar pause in non-essential work has taken place at the Magnox sites.

The NDA has also committed to the wider effort against Covid-19 and is working with local authorities and voluntary organisations. This includes enabling employees to volunteer in support of the NHS, social care and other local projects. Personal protective equipment (PPE) has been offered, and disposable respirators have been donated to help organisations in Cumbria.

1.2 All NDA Group meetings until at least the end of June have been cancelled or will be held via videoconference, with the recognition that things are unlikely to return to normal until September at the earliest. NuLeAF will continue to participate in Theme Overview Group (TOG) and Strategy 4 Development Group (S4DG) meetings via videolink.

In terms of wider engagement, all Site Stakeholder Group (SSG) meetings have been cancelled for the foreseeable future, as has the planned Strategy 4 Stakeholder Workshop. As it stands the **NDA Stakeholder Summit**, due to be held in Edinburgh on the 19th and 20th October, will proceed as planned.

NuLeAF is in discussion with NDA as to how engagement with local authorities can continue over this period.

2.3 Publication of the **NDA Business Plan** has been delayed beyond the planned publication date of March 31st, with the current disruption to Parliament meaning it was not possible to lay the Plan before Parliament before the Easter recess. It is hoped that the Plan will be published as soon as possible after Parliament returns on the 21st April. NuLeAF will circulate the final Plan to members when available.

2.4 NuLeAF submitted a detailed response to the recent consultation on the NDA's **Economic and Social Impact Strategy**¹ and is very grateful for the site-specific comments provided by a number of our members. The final Strategy is due for publication in the coming weeks, and members will be alerted once this is available. Looking forward, NuLeAF will continue to engage with NDA to encourage effective delivery of the Strategy at a national and local level.

2.5 NDA has published its mid-year performance report 2019-20². This shows that while the majority of targets have been met or are on course to be met, a number have been missed or are behind where they should be.

2. NDA Strategy 4

2.1 Work on Strategy 4 is ongoing, though at present it is unclear whether the disruption to NDA and BEIS work caused by Covid-19 may delay the publication of the final Strategy.

2.2 NuLeAF's Director participated, via video link, in a meeting of the **Strategy 4 Development Group (S4DG)** on the 25th March. The meeting involved a review of a number of draft sections of the Strategy – NuLeAF has also been submitting written comments on the current versions.

2.3 While the Stakeholder Workshop on S4 planned for May has been cancelled, NDA is still planning to run a formal consultation in the autumn and may hold an engagement event at that time.

3. Sellafield Permit Variation

3.1 The Environment Agency issued a permit variation to Sellafield on the 27th February, following the most significant review of the permit for almost 20 years. This variation was due to come into effect on the 1st April. However, Sellafield requested that this be put back until the 1st October 2020, with Covid-19 related disruption meaning that the plant was unable to make the necessary changes by the start of this month.

¹ <http://www.nuleaf.org.uk/wp-content/uploads/2020/04/NuLeAF-NDA-Draft-Socioeconomic-strategy-response.pdf>

² https://www.gov.uk/government/publications/nda-mid-year-performance-report-2018-to-2019?utm_source=daa48065-2d3b-4e1f-be7e-327e5b5ff3ef&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

The key changes to the permit are:

- Significantly reducing site discharge limits and introducing a 2-tier (upper and lower) site discharge limit structure
- Removing some site discharge limits where discharges have fallen below significant levels and they do not meet the criteria for setting limits
- Replacing plant discharge limits with plant notification levels so that Sellafield Ltd can make most effective use of the available discharge routes and treatment plants
- Removing discharge limits related to the rate of fuel reprocessing (throughput) to reflect the end of reprocessing operations.

More information is available on the Environment Agency website³.

4. BEIS Update

4.1 The impact of Covid-19 on BEIS's **Nuclear Decommissioning and Radioactive Substances White Paper** is unclear, though a number of civil servants have been moved to support the wider effort against the virus. Delays to the new Policy could have implications for the publication of NDA Strategy 4 given the need for alignment. It is hoped that BEIS will be able to provide an update on progress with the policy to the June Steering Group (which, in all probability, will be held online).

4.2 Work is ongoing to develop **Planning Guidance for In-Situ Disposal** of radioactive waste. This guidance will support and advise Local Planning Authorities, the industry and regulators in evaluating proposals for the retention of lower level radioactive material in-situ or on site as part of site clean-up and remediation.

As part of this RWPG meeting BEIS will be presenting and discussing a final draft of the planning guidance. The final version is expected to be published later this year.

5. Lillyhall landfill site

5.1 FCC Recycling (UK) Ltd has made an application to make changes to the Radioactive Substances Act (RSA) permit for the Lillyhall landfill site in Cumbria. The main proposed change to the permit is to increase the current activity limits for the disposal of radioactive waste from 4Bq/g (or 40Bq/g for tritium) to a maximum average consignment activity limit of 200Bq/g.

A consultation was undertaken on this request and the responses to this have now been published⁴, with respondents including Allerdale and Copeland Borough Councils and Cumbria County Council. A decision is expected this summer.

³ https://consult.environment-agency.gov.uk/cumbria-and-lancashire/sellafield-radioactive-substances-activities-rsa-p/?dm_i=3O4M,146R9,4YC0WQ,3X7PZ,1

6. Submarine Dismantling Project (SDP)

6.1 Following ongoing correspondence with Ian Booth, the Chief Executive of the Submarine Delivery Agency, an invitation has been extended to NuLeAF's Executive Director to visit the Rosyth MOD site where the first nuclear powered submarine is being dismantled. Clearly this visit will not be possible until after current restrictions on movement have been lifted.

NuLeAF has asked MOD if it would be possible for NFLA (as members of the former SDP Advisory Group) and Copeland Borough Council to also participate and is awaiting a response to this request.