

By email to: [businessplanning@nda.gov.uk](mailto:businessplanning@nda.gov.uk)

Date: 31<sup>st</sup> January 2018

Dear Sir or Madam,

## **Draft NDA Business Plan 2018-21 consultation response**

### **1. Introduction**

NuLeAF (the Nuclear Legacy Advisory Forum) is the Local Government Association (LGA) representative body on legacy wastes and decommissioning. NuLeAF is directly supported by over 100 local authorities and national park authorities across England and Wales and speaks for the wider local government community. Our remit encompasses all aspects of the management of the UK's nuclear waste legacy. Our primary objectives are:

- to provide a mechanism to identify, where possible, a common, local government viewpoint on nuclear legacy management issues;
- to represent that viewpoint, or the range of views of its member authorities, in discussion with national bodies, including Government, the NDA and the regulators;
- to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities; and
- to develop the capacity of its member authorities to engage with nuclear legacy management at a local level.

NuLeAF is funded by NDA, RWM and our member authorities. Our comments on the draft NDA Business Plan 2018-21 consultation are set out below.

### **2. General Comments**

We are pleased to see the commitment to start retrievals from the high hazard facilities by 2020-21. Also welcome is the anticipated movement of Bradwell to Care and Maintenance by 2019. This progress, and the work underway at the three 'Lead and Learn' sites, is a positive statement of intent. Such work can also help support the aims of the Industrial Strategy and nuclear sector deal for the UK to capitalise on its expertise in decommissioning.

The last year has been a challenging one for NDA, with parliamentary and National Audit Office (NAO) criticism of the flawed tendering process for Magnox. We support the NDA's proposals to make Magnox a wholly owned subsidiary of the Authority and hope that this will help deliver a more efficient and effective programme of decommissioning. The change of structure offers the opportunity to enhance the way in which Magnox engages and works with local authorities and communities and we look forward to continued dialogue with NDA and Magnox on this issue.

Finally, we wish to register our disappointment that, over a number of years, comments we have made on the draft Business Plan do not seem to be addressed in the final version. As we have requested in previous responses, we would like to see a paper published by NDA setting out all comments made in the Business Plan consultation, and explaining how these have been responded to, or why it was decided not to amend the Plan.

### **3. NDA Corporate Centre**

NDA will spend £3Bn of largely public money per year over the period covered by the Plan. NDA programmes should always seek to maximise the wider benefits to communities and the environment. We therefore welcome the identification of **Socio-economics, Skills and Health, Safety, Security, Environment** as three of the areas of focus for the NDA mission (pages 12 - 13).

However, the section on socio-economics commits the NDA to '*work with nuclear new build and neighbouring sites to.....maximise potential benefits to the community*' but does not reference local authorities. Local government is a crucial stakeholder and partner for NDA in this work. As the NDA mission progresses, engagement with councils will become ever more important. Local government planning and economic development functions, along with the views of local people as reflected by their elected representatives, will be critical to site restoration and the move to next planned use. Local government also has an important role in supporting education and the development of the skills required for decommissioning. Local authorities must be recognised as key partners for the NDA and this text should be amended accordingly.

We appreciate that the Business Plan is a high-level document focussed on the specific actions needed to deliver the NDA's work at individual sites. However, there are many activities and strategy development processes currently underway in Government and the NDA that will affect the operation of the NDA sites in the medium term. Examples include:

- Development of the Radioactive Waste Strategy
- BEIS work on radioactive waste policy and infrastructure
- Plans for the Magnox accelerated decommissioning programme
- Development of proposals for Proportionate Regulatory Controls (PRC)

Much of this work has progressed since Strategy III was published and a summary would provide a useful context for the Key Activities that are outlined. Information on this wider context is more limited in this Business Plan than in previous ones. From recent meetings between our members and NDA staff it is clear that more needs to be done to explain how this wider context is evolving and what the implications of this are for the NDA estate as a whole and for each site.

### **4. Funding**

The breakdown of expenditure by businesses and subsidiaries is welcome but as we have repeatedly requested we would like to see a more detailed itemisation of non-site expenditure, with separate figures for socio-economics, skills, R&D and knowledge management. It is disappointing that we consistently request that information on funding be presented in a more transparent way but that there appears to be no action taken or explanation given as to why this cannot be done.

It is also disappointing that the total provision for all these areas of work is being held at £31M in 2018/19, representing a real-terms cut and an actual decline from the £32M allocated in 2016/17.

Looking forward we hope that, as we approach the next spending review, the Government is able to maintain the resources available for the NDAs mission. In particular, any future government settlement must take full account of the decline in income from the end of reprocessing and electricity generation.

## **5. Comments on NDA Businesses and sites**

**Sellafield** The Business Plan notes that Sellafield has, since 2016, become a wholly owned subsidiary of the NDA. We supported this move, and it appears the new structure is already paying dividends. In particular, it is encouraging that retrievals from the high hazard facilities are expected by 2020-21 and that the approach taken is estimated to reduce costs by around £250million.

**Magnox** The Business Plan notes the need to support the transition of Magnox to a new operating model. The issue of asbestos management is clearly one of great importance for the Magnox stations and the commitment to produce a strategy for asbestos, without detriment to Care and Maintenance, is welcome.

As noted above, there is no reference in the Business Plan to the proposed Magnox Accelerated Decommissioning programme. We accept that this has not yet received approval but given its significance we feel it would be appropriate to at least note it at some point within the Plan.

**Radioactive Waste Management (RWM) Ltd** NuLeAF has been working closely with RWM and BEIS to advise them on the best means of engaging with local authorities around the GDF siting process. As we hopefully move towards the launch of the siting process in 2018/19 it is essential that collaborative work with local government continues. We look forward to further work with RWM in the coming year.

**LLWR Ltd** We welcome the early demolition of the bunkers containing Plutonium Contaminated Material (PCM).

In coming years there may, as a result of the planned Radioactive Waste Strategy, be further changes to the material managed at the LLWR site and disposed of via other routes. Some of these potential changes may cause concern to the communities around the LLWR site and other host sites. All such decisions must therefore be based on proper discussion as to what is acceptable, and driven by a clear community and environmental benefit.

I hope these comments are helpful.

Yours faithfully,



**Philip Matthews**  
Executive Director  
07949 209126