

MANAGEMENT OF LOW-LEVEL WASTE

Policy Statement 4

July 2007

Nuclear decommissioning and clean-up will give rise to very large increases in the volumes of Low Level Waste (LLW) and Very Low Level Waste (VLLW) requiring long-term management at a time when there are major concerns about the capacity, operation and future status of the LLW Repository near Drigg. As such, there is an onus on developing and utilising additional facilities for LLW and VLLW management. This will in turn raise various concerns amongst local authorities, including long-term safety and environmental impacts and associated issues of public acceptability.

Nuleaf recognises the need for the development and utilisation of additional LLW management facilities and wishes to encourage member authorities to engage constructively with industry on proposals. Nuleaf also highlights the importance of taking forward proposals in ways that address local authority views and can inspire public confidence.

Against this background, the following points form the basis of Nuleaf policy on LLW management:

1 Minimisation of waste arisings and disposal

Nuleaf welcomes the emphasis that Government and NDA place on managing wastes in accordance with the waste management hierarchy, that is:

- not creating waste where practicable ("avoidance");
- reducing waste arisings to the minimum through appropriate design and operation, and segregation, volume reduction and surface contamination removal;
- minimising the amount of LLW requiring disposal through decay storage, re-use and/or recycling, and incineration (under appropriately regulated circumstances); and finally
- disposal of wastes.

When applying the hierarchy, waste managers should take steps to identify and address local authority and public concerns about specific steps, including re-use/recycling¹, incineration and disposal (see below).

2 Consultation and public involvement

Nuleaf strongly supports Government policy² that the early involvement of communities and stakeholders in the development of programmes and plans for LLW management "is both necessary and beneficial". Particular emphasis should be placed on the early involvement of planning authorities. Nuleaf supports the guiding principles proposed by Government, including early stakeholder involvement in decision-making processes, openness and transparency, provision of high-quality information materials, and use of an iterative engagement process where appropriate.

3 Willingness to participate, partnership and community benefits

Nuleaf welcomes the statement in the Government's response to comments made during the consultation on policy for LLW management that it is carefully considering CoRWM's recommendations relating to site selection issues³. Nuleaf believes that the concepts of willingness to participate, partnership and community benefits should, in appropriate form, be applied to the development of new LLW disposal facilities. Nuleaf will undertake further work to identify what forms of application of these concepts are appropriate.

4 Consideration of all practicable options and addressing community concerns

Nuleaf agrees that preparation of plans for LLW management should be based on an assessment of all practicable options. The assessment of options should be participative, involving participants from potential host communities and their local planning authorities. During assessment, explicit consideration should be given to the potential impact of foreseeable risks, including the likely impacts of climate change. Significant community concerns about preferred option/s, as identified through option assessment, should be explicitly addressed through development of plans for a facility and its implementation⁴.

¹ Concern amongst some local authorities about the health and environmental impacts of recycled contaminated metals is a matter of public record. The Health and Safety Executive has considered options for controlled smelting as a means of volume reduction, and controlled re-use (e.g. within the radioactive waste management industry) and this is likely to be more publicly acceptable.

² 'Policy for the Long Term Management of Solid Low Level Radioactive Waste in the United Kingdom', 26 March 2007.

³ 'Summary of Comments and Government Response', 26 March 2007, p7.

⁴ Option assessment should take into account the potential impact of managing LLW on existing approaches to conventional waste management. Some of these approaches, including incineration

5 Presumption towards early implementation

In recognition of major concerns about the operation and future of the LLWR near Drigg, Nuleaf agrees that there should be a presumption in favour of management options that can be implemented early, including those at different levels of the waste hierarchy. Proposals for facilities for the interim management of wastes prior to final disposal should also be subject to engagement with potential host communities and their local planning authorities.

6 The proximity principle and local approaches

Nuleaf supports appropriate consideration of the proximity principle, the need to avoid the unnecessary movement of radioactive wastes, and where suitable the implementation of local approaches to LLW management. Option assessments should take into account the proximity principle and transport, alongside a range of other assessment criteria, including public safety and environmental impacts. Where local approaches to LLW management are not appropriate, consideration should be given to the use of facilities at a regional or national level, including nearest appropriate sites where such use is acceptable to potential host communities and their local authorities.

7 Openness and transparency about the inventory for disposal

An open and transparent approach should be taken to the inventory of LLW that could in principle be disposed of in a proposed facility. There should be clarity about the types of LLW and VLLW from site operations and decommissioning that are being considered, and about the possibility that the proposed facility might be developed or expanded to accommodate LLW from adjacent or other sites, and from any new nuclear power stations. Agreement should be reached with the local planning authority about the types of waste destined for disposal in the proposed facility.

8 Assessment of need for regional or national disposal facilities

As it appears unlikely that local approaches to LLW management will be possible in all areas, the NDA and its primary LLW management contractor should take the earliest practicable opportunity to review the need for the development of new regional or national LLW disposal facilities. This review should seek to identify the timescale over which such facilities will be required, and their potential capacity requirements. The review should be conducted in an open and transparent way and engage stakeholders as appropriate.

and local landfill, raise concerns for host communities and are at best only tolerated. Careful consideration should be given to the risk that the use of such options for LLW management could compromise strategies for conventional waste management.