

Meeting:	NuLeAF Steering Group, 13 April 2011
Agenda Item:	8
Subject:	Progress Report
Author:	Fred Barker
Purpose:	To report on a range of developments relating to nuclear legacy management

Introduction

This progress report covers the following items:

- NDA Strategy and meetings with Local Authorities
- radioactive waste management and new nuclear power stations
- process for siting a geological disposal facility
- the Submarine Dismantling Project, and
- NuLeAF finances.

The report is for noting.

Strategic Objectives

The developments reported are relevant to the following strategic objectives:

NDA Strategy

- Encourage development of (a) an appropriate framework for handling new developments and (b) centralised and multi-site approaches where they are supported by affected LAs in light of the overall balance of benefits and disadvantages.
- Seek to ensure that proposals for new projects that may be simpler, faster or cheaper than current practices can be convincingly demonstrated to be the best practicable, taking into account a full range of life cycle, safety, environmental and socio-economic factors, and stakeholder views.

Legacy management implications of potential new build

- Seek to ensure that proposals for radioactive waste management and decommissioning of new nuclear power stations do not prejudice effective management of the nuclear legacy.
- If proposals for new nuclear build continue to move forward, to promote debate about the interactions with nuclear legacy management and the pros and cons of utilising these interactions to the benefit of nuclear legacy management. Any such use should be in accordance with the principle that the companies concerned meet the full cost of decommissioning and radioactive waste management liabilities that arise from new nuclear power stations. This debate should include how a more coordinated 'across site' approach could be taken in locations that have or are proposed to have multiple licensed nuclear sites.

Geological Disposal Facility (GDF)

- to liaise effectively with any local authority that may wish to consider, or makes, an expression of interest in the GDF siting process and to provide assistance as appropriate
- to work with Government, the NDA, CoRWM, regulators and member authorities to help ensure that the approach based on voluntarism and partnership works robustly in practice
- to ensure member authorities are briefed and up-to-date on developments in the GDF siting process.

Submarine Dismantling Project (formerly ISOLUS)

- Encourage any member authority that may be affected by the management of the radioactive wastes from laid up nuclear submarines to participate in consultation on the proposed way forward.
- Encourage MoD to adopt clear objectives and good practices in the consultation on options for managing radioactive wastes from the Submarine Dismantling Project.
- Seek to ensure that the approach taken to the implementation of the Submarine Dismantling Project is consistent with developments in the civil nuclear industry.

1 NDA Strategy and Meetings with Local Authorities

NDA's new over-arching Strategy was published on 21 March, following approval by the Government.

On launching the Strategy, the NDA Chief Executive stated:

"Our Strategy provides us with a clear view of our 10 to 20 year priorities and the scope of work across our 19 sites. The NDA is a small strategic authority; key to our success is translating strategy into clear plans and selecting the right delivery partners to execute them efficiently. We are seeing the best international contractors competing for UK business and in so doing building UK supply chain capability for the future."

"Hazard reduction is our absolute priority and that is why we are prioritising our resources to tackle our most challenging facilities. We are also pursuing an 'optimised programme' for the decommissioning of the 10 Magnox sites - the first generation of electricity producing reactors - with accelerated progress at two 'lead sites', Trawsfynydd and Bradwell. At other sites innovative solutions to tackle specific issues will be trialled and best practice shared, bringing forward the overall timescales and reducing costs."

"Other significant challenges are around the effective management of nuclear materials and waste. We need to utilise our current and planned infrastructure more effectively to deal with the growing amounts of waste generated by the decommissioning programme and to work with Government on the implementation of policy with regards to long term waste management and the future use of our plutonium stockpile."

There is a substantial amount of documentation on the NDA website relating to the Strategy and the NDA response to comments on the consultation draft (see, for example, [Our Strategy](#) and [Consultation Details](#)). The secretariat is in the process of reviewing this material and compiling an overview of the NDA response to specific NuLeAF comments.

Preliminary points to note are that:

- The NDA's process for implementation of the Strategy includes the translation of its "strategic requirements" into *Site Strategic Specifications* that are issued to Site Licensee Companies (SLCs). These specifications detail what the Strategy means for a particular site, which then become embedded in its *Lifetime Plan*. The NDA subsequently monitors and measures the SLC's delivery performance against the agreed *Lifetime Plan*.
- The NDA states that as its Strategy develops it will continue to engage with local communities, local authorities and other relevant stakeholders as appropriate, for example, on matters such as Site End States and defining Interim States, options for oxide fuel management, the possible use of centralised and multi-site waste and material management solutions and the transportation of waste and nuclear materials.
- The NDA confirms that diverse radioactive waste management and disposal solutions will be pursued where these offer benefits over previous arrangements. It will also investigate opportunities to share waste management infrastructure across the estate and with other waste producers where it can see benefit. New waste management approaches will often require different transport arrangements and will be a matter of great interest to planning authorities and people living close to the sites involved. NDA will engage with interested

parties from an early stage, irrespective of whether such developments represent new investments proposed by NDA or by other organisations on NDA's behalf. NDA will work with key organisations, for example, local authorities, to build on the feedback it has received on how this engagement should happen and develop a framework for engagement that provides for useful discussion when considering new waste management initiatives.

Members will recall that the Steering Group meeting on 25 January endorsed a proposed approach to encouraging greater engagement between NDA, SLCs, regulators and member local authorities on site restoration at NDA sites.

Initially, this approach will be based on two 'strategic level' meetings that are taking place as follows:

- 22 June, Birmingham & Midland Institute for local authorities associated with Berkeley, Hinkley Point, Oldbury, Trawsfynydd and Wylfa sites; and
- 27 June, Local Government House for local authorities associated with Bradwell, Dungeness, Sizewell, Harwell and Winfrith sites.

An invitation has been sent to the appropriate local authorities and an agenda will be drafted over the next few weeks. The meetings will provide an opportunity to discuss the implications of the NDA's new Strategy.

The Steering Group is reminded that the provisional objectives of the meetings are:

1. To brief local authorities with NDA sites on key issues and potential developments relating to restoration, radioactive waste management, decommissioning and clean-up at the sites in their areas.
2. To identify the implications of these issues and potential developments for development control, waste planning (Minerals and Waste Development Frameworks) and socio-economic strategies.
3. To ensure that the NDA, SLCs and EA are aware of the views and policies of the local authorities relevant to the development of site plans and programmes for site restoration, radioactive waste management, decommissioning and clean-up.
4. To ensure that representatives of the relevant local authorities have the opportunity to be appropriately involved in the development of site plans and programmes including, where appropriate, participation in assessments to identify preferred options.

2 Radioactive Waste Management and New Nuclear Power Stations

The January meeting of the Steering Group delegated authority to the Chair and Vice Chair to approve the submission of comments on the Government's proposed Funded Decommissioning Programme Guidance and its Waste Transfer Pricing Methodology. Comments were submitted in early March and are available on the NuLeAF website at [NuLeAF Consultation Comments 2011](#).

As reported under the item on the potential implications of the Fukushima accident, the Government is giving further consideration to the draft Nuclear National Policy Statement in light of the emerging nuclear crisis in Japan before proceeding with the ratification process. Other processes that could be affected by the current nuclear safety review include the Generic Design Assessment process for new nuclear power stations and the timetable for investment decisions in new build.

With regard to specific new build proposals:

- Hinkley Point: EDF published a further round of consultation, setting out proposed changes and alterations to its 'Preferred Proposals'. This outlined the changes made following the previous 'Stage 2' consultation in October 2010. The consultation period ran from 28th February to 25th March. Although the 'Preferred Proposals' now address a number of comments made by Somerset local authorities, it is understood that there are still significant concerns, in particular, about a lack of a full appraisal of local impacts (see for example [Sedgemoor District Council voices 'serious concerns' over Hinkley](#)).
- Sizewell: the Executive Director met with officers from Suffolk CC and Suffolk Coastal DC on 26 January to discuss the radioactive waste management implications of the proposed new station at Sizewell. Subsequently, on 18 March, EdF made a presentation to representatives of the Suffolk local authorities on outline arrangements for radioactive waste management.

Those attending the Steering Group meeting may wish to provide further verbal updates on proposals at specific sites.

3 Process for Siting a Geological Disposal Facility (GDF)

The latest information from the West Cumbria MRWS Partnership includes:

(i) Partnership meeting

The latest Partnership meeting was held at the Copeland Centre, Whitehaven, on 3rd March 2011. The main item at the meeting was a review of the NDA's Research and Development Programme. The Nuclear Decommissioning Authority's R&D team gave a presentation on how they are approaching this work. There was also an assessment of the NDA's programme from an independent peer reviewer, Professor Stuart Haszeldine from the School of GeoSciences at the University of Edinburgh, which had been specifically requested by the Partnership.

Professor Haszeldine was complimentary about the breadth and scope of the programme, but he offered some constructive criticism on a number of points. These included suggesting that the NDA should:

- make it clearer what priority was being given to different parts of the R&D programme, to make the information more transparent and useful,
- make the timescales of the research delivery clearer, and how this relates to the MRWS process stages,
- provide information on costs to indicate the scale of the research task at hand,

- place increased emphasis on research into gas release from a geological disposal facility (GDF), underground water flow, and land uplift due to heat generation from waste.

There was also comment on the R&D plans from the Environment Agency and the Committee on Radioactive Waste Management (CoRWM).

The NDA agreed to provide a response to the points that had been made by early April.

(ii) Public & Stakeholder Engagement (completion of PSE2)

Before the Partnership makes any recommendation on whether to proceed into the Government's siting process, there are three separate rounds of 'Public and Stakeholder Engagement'. The second round of public and stakeholder engagement (PSE2) was held between 8th November 2010 and 11th February 2011. A key priority in PSE2 was to significantly raise awareness of the issues involved in the Managing Radioactive Waste Safely (MRWS) process and to seek people's views on three key issues:

- how to use public views to decide whether to proceed,
- impacts and community benefits,
- community involvement in a potential siting process.

The results of the second stage of public engagement are currently being analysed by the Partnership. A full report and recommendations on these will be published later in the spring and this will be made available on the Partnership website.

Once the Partnership has produced a provisional report with its advice to the councils, there will be a third and final round of public engagement starting in the late Summer/early Autumn of 2011. This third round will include a formal consultation on the Partnership's preliminary findings and advice to the councils before a decision is made about whether to proceed further, or withdraw.

(iii) Letter from CoRWM on geology of West Cumbria

In recent months there has been some debate about whether West Cumbria's geology is unsuitable for an underground repository. The British Geological Survey (BGS) report in October 2010 said the geology of some parts of the area is clearly unsuitable based on the available information, for example, because of coal deposits. However, in the Partnership's last newsletter Professor David Smythe argued that all of West Cumbria had been ruled out on geological grounds by a planning inquiry in the 1990s, when Nirex looked at an area near Sellafield.

The Committee on Radioactive Waste Management (CoRWM) has written to the Partnership with its view. CoRWM says: 'Our position is that there is presently no credible scientific case to support the contention that all of West Cumbria is geologically unsuitable'. They add that the inspector at the inquiry 'did not at any stage reflect upon or draw conclusions on the suitability or otherwise of West Cumbria *as a whole*.'

CoRWM emphasise that it would not be possible to tell whether the area's geology is suitable without carrying out further investigations. If West Cumbria does take part in the search for somewhere to locate a repository there would be more detailed studies of a range of factors, as well as geology and the community would be involved in overseeing this work.

(iv) NDA Disposal System Safety Case

In February 2011, the NDA published a suite of generic scientific and technical reports setting out all of the safety factors that they believe need to be considered in submitting an application to the nuclear regulators for permission to operate a deep underground disposal facility.

Following on from the NDA's 'Geological Disposal: Steps towards implementation' report published in July last year, these latest reports are collectively known as the Disposal System Safety Case (DSSC). They cover a host of safety issues including:

- the waste to be disposed of and how it will need to be packaged,
- the safety of the transport to and within the disposal facility,
- the safety of operating such a complex facility and the safety to the environment during all of these phases and into the future long after the facility has been closed.

The NDA says the Disposal System Safety Case documents assess the safety and environmental implications of all aspects associated with the geological disposal of higher activity radioactive waste in the UK. The organisation says preliminary, generic assessments have helped highlight areas where further research is required and the uncertainties that will need to be resolved during a site investigation programme.

The NDA's approach to safety case development is being discussed at the Partnership meeting on 14 April. This meeting will also consider the NDA's response to the safety issues raised by critics.

4 The Submarine Dismantling Project

As reported to previous meetings, the SDP has been conducting a Strategic Environmental Assessment (SEA) that identifies and considers the potential environmental impacts of submarine dismantling activities. As part of this process, potential candidate sites for the removal of radioactive elements ('initial dismantling') of submarines have been named in the SEA scoping report (see the SDP website at [Submarine Dismantling](#)). These sites are Devonport and Rosyth Royal Dockyards.

Potential candidate sites for the storage of resultant Intermediate Level radioactive Waste (ILW) will not be identified at this stage due to the developing nature of NDA and MoD strategies on radioactive waste management.

MoD is currently undertaking more detailed options analysis and environmental assessment of 'integrated options' (which combine different technical approaches, dismantling sites and generic storage options). MoD plans to conduct public consultation in the autumn. Then, taking the SEA, options analysis and public consultation responses into account, MoD will complete its analysis leading to strategic decisions on the project.

The MoD has briefed representatives of Plymouth City Council about assessment to date and plans for consultation. Future discussions will develop plans for the local aspects of consultation in the Plymouth area.

5 NuLeAF Finances

At the AGM in October, it was agreed that the Steering Group should receive regular finance updates in the light of a potentially difficult funding position in the next Financial Year (FY).

Estimates for FY 2010-11

It is anticipated that expenditure and income figures will be very similar, at around £113, 000. The annual audit of NuLeAF's accounts is currently underway and the main findings will be reported to the July meeting.

Estimates for FY 2011-12

In the current projections, there is an estimated shortfall of around £36,000 for 2011-12, as a result of an anticipated loss of financial support from Government. The projected shortfall can be met from reserves.