

RADIOACTIVE WASTE MANAGEMENT: MAKING COMMUNITIES HEARD

Seminar report, October 2015

Introduction

This report provides an overview of the presentations and discussion at the annual NuLeAF seminar which took place in Local Government House on 30 September 2015.

The seminar focused on two important current issues in radioactive waste management: the draft strategy review in preparation for public consultation on NDA Strategy III; and community involvement in the Geological Disposal Facility siting process.

In total 32 people participated in the seminar, including representatives from 13 local authorities. Participants also came from NDA, DECC, RWM, Local Partnerships, University of East Anglia, CoRWM, and two independent consultancies.

The seminar agenda is attached as [Annex A](#). Speaker presentations are available on the NuLeAF [website](#). The participants list is attached as [Annex B](#). The information sheet is attached as [Annex C](#).

Background

At the core of the Nuclear Decommissioning Authority's (NDA) mission is the clean-up of sites and the development of a Geological Disposal Facility for the UK's higher activity wastes.

The NDA Strategy, reviewed and updated every 5 years to comply with The Energy Act 2004, underpins all the work of the organisation. Strategy III, due for publication in April 2016, will set out the NDA's Strategy for the completion of its decommissioning mission. Of particular interest to local authorities is how, against a backdrop of severe constraints on public finances, we ensure that Strategy III meets the needs of communities.

The Geological Disposal Facility (GDF) White Paper, published in July 2014, reaffirmed the Government's commitment to the identification of a 'volunteer' host community for the GDF. Proposals are being refined at present, but for it to be

successful the approach taken must be workable and deliver the maximum economic, social and environmental benefits.

Key points from the presentations and question and answer sessions

Session 1: Presentation by the Nuclear Decommissioning Authority on draft Strategy III¹.

Sarah Johnston, Head of Strategy Development at NDA provided an overview of the timetable for consultation on the draft Strategy. The Strategy would be informed by the outcome of the Comprehensive Spending Review and the requirements for clean-up at Sellafield.

Questions on strategy development:

Q: What will be done if the THORP processing plant closes without reprocessing all wastes?

A: We are looking at solutions which could be used such as encapsulation and dry storage. Waste would be made safe and stable for disposal.

Q: What is the difference between information and knowledge referred to in the draft strategy?

A: We have a lot of information in the form of documentation, samples, test results and drawings. Knowledge is the personal experience of people who have been working in the industry.

Q: To what extent are you looking at the synergies with new nuclear build?

A: There has been some joint stakeholder engagement. We have also discussed whether there are opportunities to accelerate decommissioning which would facilitate construction of new nuclear facilities.

Q: How will the strategy support the engagement of local businesses in NDA work?

A: Although the strategy is not being changed at the top level, efforts are being made to do more to bring benefits to each locality.

¹ <http://www.nuleaf.org.uk/wp-content/uploads/2015/10/NDA-S3-presentation.pdf>

Summary of responses to the break-out group questions:

1. Do you agree that the NDA should aim to progress decommissioning and remediation on as broad a front as far as resources allow or focus on prioritised projects (Draft Strategy pages 20-22)

- There needs to be a balance between hazard reduction and addressing the needs of communities around all sites. It is important that sites work together, to transfer knowledge, and optimise assets and solutions. The approach taken needs to be balanced, and not just focused on priority tasks, nor a scatter gun approach. Where operational and decommissioning stations are co-located the approach needs to be co-ordinated to optimise assets.
- The highest risks are at Sellafield. If big budget cuts are made as a result of the Comprehensive Spending Review then NDA needs to ensure high hazard facilities are tackled. By focusing on Sellafield you might find solutions for other sites, but other sites need to understand the special risks at Sellafield.
- There is a moral imperative that waste is not left for future generations to deal with. The NDA and government must recognise the negative socio-economic effects of not delivering on commitments to clean up sites, and the impact this will have on future site use and the confidence of the community in the nuclear industry.
- If there are constraints on funding for clean-up, NDA must develop a rational approach to prioritising action. Some sites may have greater economic value to communities if cleared. This should be taken into consideration, as should the greater need for economic regeneration at some sites. Also important in assessing some areas will be the potential to use sites for nuclear new build.

2. Do you agree it is appropriate for NDA to stop remediating a site where further remediation will do more harm than good, and use administrative controls to protect people and the residual hazards? (Draft Strategy pages 30-31)

- It was suggested that this question should be split into 2 to provide clarity, and that it would be necessary to explain and clarify, site by site, what the 'harm' would be should remediation continue beyond a certain point.
- Rather than stopping remediation, it was felt that it would perhaps be better to say 'pause' and then return to remediation when solutions had been found. Public confidence could be gained by completing some sites and deferring others.

- With regard to the use of institutional controls it was felt that, based on the dialogue between NuLeAF's planning group and the regulators, the planning regime was not suitable to manage land. Local authorities also lacked the resources and requisite skills to deal with the remaining hazards.
- The Environment Agency was seen as the appropriate body with the necessary skills to carry out monitoring of the site.
- It was suggested that NDA should work with local communities to review site end states.

3. What are your views on the waste management principles described in this strategy? (Draft Strategy pages 55-56)

- Based on current science/understanding of the waste types, the strategy seems appropriate, but NDA needs to look at what else can be done. The underlying waste management principles aren't spelled out in the strategy and NDA needs to make them more visible and improve the presentation.
- It was felt that waste categories don't matter to the general public: it's all waste. The NDA needs to undertake significant communication and engagement work to improve the general understanding of radioactive waste and the issues in managing different classifications of waste.
- The current system is easy to understand and any move to a risk based system would require a public education programme as to why the change was being made, providing reassurances that safety was not being diluted in order to save money.
- It was noted that the strategy makes no mention of the communities which host the waste facilities.
- The strategy should talk about development plans rather than planning authorities.
- Information should be provided on what waste will go for direct disposal and what to treatment.
- The achievements by the Low Level Waste Repository in diverting almost 90% of waste away from disposal at the site should be highlighted. The UK supply chain

should be supported to provide facilities for treatment driving wastes up the waste hierarchy.

4. *When considering a regional approach to stakeholder engagement, we have identified three options that we could use. Which approach do you think we should take? (Draft Strategy pages 88-89)*

Option 1 – Continue with the current format of national events and issue led engagement

Option 2 – Replace the National Event with a series of regional or SLC based events

Option 3 – Continue with the current format of National Events and issue-led engagement and add periodic events at Dounreay and Sellafield in conjunction with the SSGs.

- Delegates acknowledged that it was important for NDA to review their engagement process to ensure it was effective. It was felt that whilst a national event is useful in providing an overview, a multi-layered approach would be effective in ensuring as wide an audience was reached as possible.
- NDA should make greater use of social media to engage.
- Whilst it was recognised that Site Stakeholder Groups are part of the engagement picture they are not the whole and do not provide a vehicle for detailed discussion. It is important that as sites move further towards decommissioning the role of the SSG is reviewed and if necessary, revised. NDA should consider how it can use NuLeAF to better engage with local authorities.
- Engagement with local authorities is paramount, but there also needs to be engagement with other interested bodies on infrastructure issues.

Session 2: Presentation by the Department of Energy and Climate Change on the Geological Disposal Facility (GDF) siting process².

Bruce Cairns, Head of Geological Disposal at DECC gave an overview presentation of the history of nuclear power in the UK and radioactive waste management.

² <http://www.nuleaf.org.uk/wp-content/uploads/2015/10/NuLAeFSeminarSept2015FINAL.pdf>

Question on GDF siting process:

Q: What happens if no community comes forward?

A: Experience from around the world shows this process can work, and if the current approach fails to find a community then the engagement process would have to be refined. The government is committed to voluntarism but if, after extensive efforts, no community comes forward, then with reluctance the government may have to go down another path as it is essential that a solution is found. The European Commission expects clarity on how wastes will be dealt with and this will also drive action.

Summary of responses to the break-out group questions:

1. Given the long timeframes involved in siting a GDF, what is the best way for local authorities to be involved throughout the duration of the siting process?

- Delegates pointed out that given the current devolution debate, local government bodies may not exist in their current format by the end of the 15-20 years siting process. There will also be changes in the political leadership of councils, both in terms of individuals and parties. The siting process will take place over several electoral cycles and the developer must engage with all political parties in an area to establish consensus and build understanding of the issues.
- The developer should recognise that the different tiers (where they exist) of local government will be interested in different aspects of the process.
- The process would benefit from the local authority working with the community rather than taking the lead, as this would allow it to be impartial. The process followed in West Cumbria worked well, where the local authorities were part of the Partnership considering the process. Lessons can also be learnt from the Hinkley Point C process.
- It is important that the developer engages with communities early and that the process is inclusive bringing in those opposed as well as those for the development. The developer needs to understand the community.
- Local authorities need to be properly resourced to deal with issues around the siting process. Consideration needs to be given as to how this can be funded.

2. How does a community show that it is 'constructively engaged' in order for it to receive community investment funding of £1m?

- Educating the community to understand the issues involved is seen as key. It was suggested that guidelines on engagement produced by Sciencewise³ could be used as a starting point. The definition of a community will impact on all aspects of the engagement process.
- A clear budgeted process with a business plan would provide a framework for the community, and a 'timewaster test' would ensure that efforts are focused where there is the possibility of success.

3. What are the practical options for delivering a legitimate test of public support?

- Delegates favoured a referendum over an opinion poll, though it was noted that the latter had been used during the last siting process, albeit at an early stage.
- A clear and acceptable definition of who could take part in any referendum is essential.
- It was stressed that any referendum should be held separate from local elections so as to avoid confusion of the issue and that local authorities must not be seen as the decision making body.
- A tiered approach to engagement may be appropriate with weighting being given to those most impacted by the development. This could then be linked to the disbursement of community investment.

Overview by NuLeAF

Philip Matthews, Executive Director of NuLeAF, highlighted a few key issues to emerge from the seminar.

In respect of the draft NDA Strategy III it had been recognised that the outcome of the Comprehensive Spending Review would have a significant impact on the NDA's plans, and it was therefore important that the decision making process around future options was evidence based and clearly understood by stakeholders. It must be

³ <http://www.sciencewise-erc.org.uk/>

explained how national strategy correlates to local actions and what this will mean for the public and communities around sites.

In discussions about the Geological Disposal Facility siting process, the definition of a community is a critical issue but one that had not been properly addressed as yet by the Community Representation Working Group (CRWG). It was also important that transport issues were recognised and the impact and involved of the communities along the transport routes.

Philip concluded the seminar in thanking the presenters and participants for their engagement in what would be an on-going dialogue on these two topics.

Annex A:

**RADIOACTIVE WASTE MANAGEMENT:
MAKING COMMUNITIES HEARD**

**Seminar, 30 September, 2015
Local Government House**

Agenda

10.30 Registration and coffee

11.00 Welcome and introduction: *Cllr Brendan Sweeney, Vice-Chair, NuLeAF*

NDA Strategy III

11.05 Strategy III and local authorities: *Sara Johnston, Head of Strategy Development, Nuclear Decommissioning Authority*

11.25 Break-out sessions

12.25 Feedback from break-out groups and plenary discussion

12.45 Lunch

Geological Disposal Facility Siting Process

1.15 Proposals for Geological Disposal of Higher Activity Wastes: *Bruce Cairns, Head of Geological Disposal, Department of Energy & Climate Change*

1.45 Break-out sessions

2.30 Feedback from break-out groups

2.45 Plenary discussion

3.15 Overview of the day: *Phil Matthews, Executive Director, NuLeAF*

3.25 Closing remarks: *Cllr Brendan Sweeney, Vice-Chair, NuLeAF*

3.30 Finish

Annex B: RADIOACTIVE WASTE AND SPATIAL PLANNING

Speakers and facilitators

Sara Johnston, Head of Strategy Development, NDA
Kelly Anderson, Stakeholder Engagement Manager, NDA
Bruce Cairns, Head of Geological Disposal, DECC
Jessica Ellis, Head of Engagement, Geological Disposal Facility, DECC
Simon Bandy, Local Partnerships
Liz Waugh, Local Partnerships
Julie Jacques, Local Partnerships

Delegate List

David Collier	White Ox
Steve Smith	Copeland Borough Council
John Rennilson	CoRWM
Cllr David Southward	Cumbria County Council
Richard Griffin	Cumbria County Council
Nigel Mehdi	Equitis
Lesley Stenhouse	Essex County Council
Adrian Hurst	Hartlepool Borough Council
Cllr Malcolm Grimston	London Borough of Wandsworth
Trevor Brown	Oxfordshire County Council
Mary Thompson	Oxfordshire County Council
John Dalton	RWM
Cllr Peter Downing	Sedgemoor District Council
Doug Bamsey	Sedgemoor District Council
Katharine Harvey	Shepway District Council
Paul Browning	Somerset County Council
Gillian Ellis-King	South Gloucestershire Council
John Pitchford	Suffolk County Council
Peter Simmons	University of East Anglia
Cllr Chris Morgan	West Somerset Council
Andrew Goodchild	West Somerset Council

NuLeAF

Cllr Brendan Sweeney, Vice-Chair (Barrow-in-Furness Borough Council)
Philip Matthews, Executive Co-Director
Catherine Draper, Administrator

Annex C:

INFORMATION SOURCES ON THE MANAGEMENT OF RADIOACTIVE WASTES

NuLeAF Seminar, 30 September 2015

This document is posted on the NuLeAF website (www.nuleaf.org.uk). To access the documents, just click on the hyperlinks below.

1 Government Policy and Guidance

- [2010 to 2015 government policy: radioactive and nuclear substances and waste](#)
- [Implementing Geological Disposal](#)
- [Geological disposal of radioactive wastes: a guide for communities](#)
- [Policy for the Long-Term Management of Solid Low Level Radioactive Wastes in the UK](#). An updated LLW Strategy is expected in autumn 2015.
- [Over-arching National Policy Statement for Energy \(EN-1\)](#)
- [Waste and decommissioning financing arrangements](#)
- [Guidance for local planning authorities on implementing planning requirements of the EU Waste Framework Directive \(2008/98/EC\)](#)
- [Waste management plan for England](#)
- [National Planning Policy Framework for England and planning practice guidance](#).

2 NDA Strategy

[NDA Draft Strategy](#)

[NDA Strategy 2011-2016](#)

[NDA website](#)

3 Geological Disposal of Higher Activity Wastes

- [Implementing Geological Disposal](#)
- [Community Representation Working Group](#)
- [Geological disposal of radioactive wastes: a guide for communities](#)
- [Issues Register](#)
- [Joint regulatory guidance on the management of higher activity wastes](#)
- [Consultation on National Geological Screening Guidance](#)
- [Glossary to National Geological Screening Guidance](#)
- [NDA response to comments by Independent Review Panel on draft National Geological Screening Guidance](#)
- [RWM website](#)