

## **Review of the Siting Process for a GDF**

Consultation Response by David M Nichols 30 November 2013

### **Question 1**

**Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place? If you do not agree with the need for such a test, please explain why.**

Yes, I agree that a test of public support is required at this stage. How it is locally decided and agreed should rest with the local govt. body e.g. Planning Dept. of MBC or Council chamber. They must take full accountability and once that consensus decision has been taken by them it must be binding. There needs to be a penalty for default once the right of withdrawal gate has been passed. The government or some other body on their behalf must second in or seed these host councils with the appropriate people to enable these decisions. This is a massive ask and local government and councils generally do not employ the people who can make these decisions about the storage of nuclear waste.

### **Question 2**

**Do you agree with the proposed amendments to decision making within the MRWS siting process? If not, how would you modify the proposed phased approach, or, alternatively, what different approach would you propose? Please explain your reasoning**

A good process, much improved and addresses my previous comments. However, like all business processes it needs leadership, judgement, decisiveness and pragmatism to yield the required outcome.

### **Question 3**

**Do you agree with this approach to revising roles in the siting process set out in the White Paper? If not, what alternative approach would you propose and why?**

A good approach and the structure and key roles of the participants are appropriate. The regulators must proactively accept in principle the philosophy of the proposals as the siting process proceeds. They can readily do this by all of the regulators e.g. EA, ONR (NII), etc being involved in the planning process in a proactive way. This should be a stage-gated process and agreed by all. The NDA's site license companies have world-class stage-gated processes and they should be adopted for this undertaking. Regulators can readily contribute in this proactive way without prejudicing their independence or compromising

their final say. As with the councils above if the regulators do not possess the right people to participate they should be recruited.

This process depends upon the calibre, capability, vision and leadership skills of the people involved. Good professional people can move appropriate decisions quickly without prejudice. For instance involving the Royal Academy of Eng. or the Royal Society or any other learned body is absolutely right but to make progress in delivering the right solution the quality of the individuals in the delivery line is fundamental. It requires deliverers not ditherers (i.e. does not procrastinate) from all parties to this process. Devolving or delegating this role to major private companies will not deliver the programme. The NDA (or preferably a completely separate body akin to the Olympic Delivery Authority) should lead. The Olympic Park was a major success for the UK and the learning must be built upon.

#### **Question 4**

**Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process? If not, what alternative approach would you propose and why?**

The proposed methodology as a process is acceptable. However because of the nature of the geology, and perhaps more importantly the hydrogeology, in the UK it may not be possible to prove it a barrier or containment for long lived isotopes in certain wastes. Obviously burying the waste from a standpoint of security or future extreme hazards is acceptable. Therefore the geology should not form part of the containment safety case and should be determined by multi-layers of man made barriers whereby should failure eventually occur the decay of the isotopes will have rendered them relatively harmless. Additionally, is it really viable to move the immense volume of Intermediate Level Waste from Cumbria to elsewhere in the UK from both an environmental and financial standpoint? The whole process seems somewhat academic in this light and needs to confront the practical realities.

**Question 5 – Do you agree with this proposed approach to planning for the geological disposal facility? If not, what alternative approach would you propose and why?**

Notwithstanding the issues raised above the proposed planning regime is a good process. However it has little track record in the UK to date for a contentious program of this nature and therefore not without risks

**Question6- ‘Do you agree with this clarification of the inventory for geological disposal and how this will be communicated with the volunteer host community? If not, what alternative approach would you propose and why?’**

The radioactive inventory needs to be articulated and put into a perspective that the public can understand. Particularly the number of containers and transportation movements. Obviously this does not just apply to host and recipient communities but also those communities through which the material will travel. As well as activity category and level a way of communicating the longevity of the wastes needs to be provided. This is best communicated by visual techniques as well as data. A lot of Strategic Plan documents produced by the NDA’s SLCs do this very well.

**Question 7 – Do you endorse the proposed approach on community benefits associated with a GDF? If not, what alternative approach would you propose and why?**

This is a much improved approach and agree with the philosophy of it. This question is inextricably linked to Q8. As well as compensation the emphasis must be on the opportunities it provides the community for development. Must emphasise and promise development funding as a nuclear centre of excellence internationally. Explain the parallels with other countries e.g. Finland and Sweden. Obviously there must be significant improvements to the local infrastructure including education and health

**Question 8 – Do you agree with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF? If not, what alternative approach would you propose and why?**

This is the correct approach. Fundamentally it has to project the long term gain for the initial pain of accommodating a major construction infrastructure project with all of the accompanying itinerant workforce and community change. There are plenty examples of good practice in the UK and abroad where the socio-economic benefits are assessed as part of the consultation and planning process. The former will require significant investment. By example waste could be finally treated or manufactured into its final form at the site of the repository. For instance all waste does not need to be made into its final form at Sellafield. It could be transported in an interim state. This would obviously provide manufacturing jobs for the host community. In the longer term further research and development. Nuclear waste will always exist and ways of treating it will continually develop. If repositories are to be built away from Dounreay, Sellafield or any of the other nuclear sites in the UK then some of the skills and capabilities must move to the waste or repository sites. This is a positive opportunity for those communities.

**Question 9 – Any other comments?**

The process is much improved than that provided at the Call for Evidence. The learning and focusing phases are particularly innovative and DECC & NDA should be commended for this document.

However, whilst the proposed process is excellent in theory, for it to deliver the practical realities outlined in the above responses should be addressed as soon as practicable for the process to provide a successful and timely outcome.

**David M Nichols**

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**Independent**