Food Standards Agency

The FSA's response to the consultation on the Secretary of State's proposed decision as Justifying Authority on the Regulatory Justification of the UK Advanced Boiling Water Reactor (UK ABWR)

I am responding on behalf of the Food Standards Agency in its role as a statutory consultee under the regulatory justification process.

As stated in the consultation document the Food Standards Agency is a non-Ministerial government department responsible for food safety for the UK. We are thus an independent authority on food safety and to do this we assess the risk to the food supply from a wide range of sources and operations. Part of this work covers the assessment of risk to consumers from radioactive discharges from nuclear sites.

The Food Standards Agency has developed an expertise in prospective assessments for the risk to consumers from radioactive waste discharges. We have used this knowledge to assess the potential risks from the generic proposed discharges from the UK Advanced Boiling Water Reactor (UK ABWR). For the consideration of the justification of this design of reactor the risks to consumers are considered as detriments. In making the decision the Secretary of State will have given regard to these detriments and compare them to the benefits from the power production, etc. It is the view of the Food Standards Agency that the potential doses from this design of reactor are sufficiently low as to be acceptable and as such the detriments from the operation of this reactor type are unlikely to be disproportionate to the benefits.

We note that reprocessing of spent fuel is not to be allowed for this reactor type. The Food Standards Agency welcomes any initiative that reduces the overall radioactive waste discharge inventory and any improvements in waste reduction.

If there is a subsequent request for a permit for site specific radioactive waste discharges from this reactor type then the Food Standards Agency will be involved in the assessment stage and we will undertake a site specific assessment as part of this process. It is not expected that the dose estimate will increase when using site specific parameters for a site-specific application. As such the detriments, in terms of dose, from this reactor type for any actual location proposed are not expected to increase compared to the generic version that the justification decision is based on.

As mentioned above the dose to consumers is considered a detriment for the determination of justification of this reactor type. In the proposal the potential doses for a generic reactor were described. The Food Standards Agency considers that the evidence on these doses used by the Secretary of State in making their decision on the justification of this reactor type are appropriate for the purpose. As such the Food Standards Agency has no reason to disagree with the Secretary of State's decision in agreeing to the justification of this reactor type.