MOX CONSULTATION 4.

Analysis of their depletion has enabled an estimate of the length of time the Thorium fuel rods unearthed at Winfrith actually spent in the prototype reactor they were made to power. The experiment was discontinued very quickly.

When they came to light they had been buried and forgotten for some four decades without detectible hazard-noone still employed at the works knew they were there, nor, when first retrieved from burial, what they were for.

But for civil, fission powered nuclear generation the Thorium cycle offered a distinctly superior technology which was only set aside because the objective of nuclear programmes was plutonium production. Whatever its merits, Thorium was not a means to produce warheads.

Today the US & Russians are seeking to agree terms on which to neutralise unwanted warheads by incorporation of Plutonium into MOX fuel. The US Nuclear Regulatory Commission is considering an application to construct a facility at Savannah River.I am sympathetic'theirview that Pu is a dangerous liability which needs to be neutralised by some means. I advocate keeping an open mind as how best this can be achieved.

BNFL's approach by contrast, has been to reiterate the benefits of separating Pu from spent fuel;they have already made the investment in a MOX facility before appproval has been secured. They have sought to narrow the terms on which such approval should be considered to avoid the implicationthat Pu disposal should be undertaken in tandem with the decision to halt its production.

In other words the reference case on which the public are being invited comment reflects only the putative profitability of those contracts which BNFL have contived to enforce on their clientele which in the first place bind them into paying for spent fuel to be reprocessed and then, bolted on top as it were, oblige them to buy into the Plutonium economy over which BNFL seeks to exercise monopoly.

That is not a sustainable economic strategy. As I outlined above there are alternative means to power reactors for civil use that do not deliver operators into the pocket of what has now become a very large multinational.

Over the course of four public consultation exercises on MOX, the terms of debate have been whittled away down to the point that only those contributions which make the same assumptions as form the premises for the reference case will be deemed valid.

This, not surprisingly, is itself a circular argument:those contracts have been written with the express intention of a profitable outcome for BNFL regardless of the impact on their clientele-therefore, unless the contracts are set aside or the clients wiped out, they will generate a profit for BNFL. QED.

However not even BNFL have the bare-faced arrogance to vite comment on their marketing posture in thse terms. Instead we are presented with a carefully elaborated spreadsheet model which gives the appearance that market analyses of Nuclear Fuels are subject to much the same approach

modellers adopt in respect of conventional energy feedstocks.

Now the way to challenge the implicit fallacies of such a model is of course to test it against real life.Models are useful if they show robust consistency with real market conditions under wide flutuations in valueof the parameters the model employs. An ideal opportunity arises to test the rigour of a model when a sudden, step funtion change takes place to a variable and its effect can be monitored over the period the model predicts such a fluctuation could produce a distortion in the market.

Although they should not be thought to have deliberately arranged for it, BNFL could not have presented themselves with a better opportunity to test their model than the episode they have called the MOX Data Falsification at MOX Demonstration Facility (MDFMDF).

Instantly demand for their product plummeted. Over the subsequent months the company have nurtured its recovery as assiduously as they were able to. And now they are making it clear that if they are not permitted to proceed with the next stage of committed investment, they will lose the opportunity to build a successful market for themselves.

Effectively they have performed the textbook exercise of testing an econometric model, -they must have, becauuse they have continuously monitored the success of measures taken to restore confidence in demand terms throughout the ensuing period.

What they have omitted is to publish these figures, or the results that analysts might use to make an assessment of the rigorousness of their model. So, having shot themselves in the foot with MDFMDF, they are leaving a lethal flaw in their case unless and until they show that the events which flowed from their initial blunder are consistent with the story they would like us to believe about blunder-free market operation.

It is a glaring omission which no serious shareholders would allow on the part of management in any other context. The Government are the majority shareholders and the public are therefore entitled to put forward requests for information the company is using to inform their decisions while refraining from its publication.Indeed, by a finding of the European Commission in 1996 they are bound in law to make available their information about nuclear energy and other such matters of environmental significance whether or not it is requested.

If the model presented in their submission is a useful predictive instrument in formulating energy policy, they have the evidence that would lend it plausibility.If not, they are not using it themselves, and neither should we.