

By email to: [NGSconsultation@nda.gov.uk](mailto:NGSconsultation@nda.gov.uk)

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Executive Director: Philip Matthews  
e-mail: [REDACTED]

Director's Assistant: Catherine Draper  
e-mail: [REDACTED]

Tel: [REDACTED]

Dear Sir/Madam

## **National Geological Screening Guidance: A public consultation**

### **1. Introduction**

NuLeAF (the Nuclear Legacy Advisory Forum) is a Special Interest Group of the Local Government Association (LGA), directly supported by 108 local authorities and 3 national park authorities across England and Wales. Our remit encompasses all aspects of the management of the UK's nuclear waste legacy. Our primary objectives are:

- to provide a mechanism to identify, where possible, a common local government viewpoint on nuclear legacy management issues;
- to represent that viewpoint, or the range of views of its member authorities, in discussion with national bodies, including the Welsh and UK Government, the NDA and the regulators;
- to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities; and
- to develop the capacity of its member authorities to engage with nuclear legacy management at a local level.

NuLeAF was a key partner in the former Managing Radioactive Waste Safely (MRWS) process and has been closely involved in shaping the new policy through discussions with DECC, RWM Limited and other parties. Our Executive Director is a member of the Community Representation Working Group (CRWG), established by DECC to consider community engagement and implementation processes for the GDF siting process, and we are also actively engaged in the parallel work on land use planning and geology.

Working with RWM, we hosted a local authority workshop on the geological aspects of the Geological Disposal Facility at our October 2015 Steering Group meeting. Around 20 of our members attended (along with some additional participants). In preparing this submission we have drawn on those and other discussions at our Steering Group and Radioactive Waste Planning Group (RWPG).

## **2. Overview and general comments**

NuLeAF is very aware of the importance of resolving the issue of the long term disposal of radioactive waste, and the implications that any delay in this process has for the communities that currently host waste storage facilities. We therefore look to NDA and RWM to ensure due progress is made in resolving this issue.

The geological aspects of the Geological Disposal Facility siting process are crucial to its success. In making a decision to enter into the siting process, a community needs to know, with as high a degree of certainty as possible, that the geology in their area is likely to be capable of hosting such a facility.

As the siting process progresses, and further investigations are made, both the developer and community must have confidence that the proposed site of the Geological Disposal Facility has a geology that can safely contain all waste deposited.

Underpinning this are three central challenges:

- At the outset of the process, to provide as much information as possible on geology across England, Wales and Northern Ireland, in a form that is accessible to non-expert audiences and communities;
- To ensure that further investigations (such as deep boreholes) in candidate areas lead to the greatest clarity possible on the geology. This must be coupled with advice from acknowledged experts, ensuring a high degree of confidence in the safety of the facility; and
- That local authorities, community siting partnerships and communities are effectively engaged throughout, enabling them to be reassured as to what is proposed. Given that the siting process is based on voluntarism, this is vital. Uncertainty about geology was one of the reasons for the failure of the previous Managing Radioactive Waste Safely process in West Cumbria.

The screening guidance provides an important framework for the delivery of an effective process. Below we offer our response to the specific questions posed.

## **3. Response to questions**

**Question 1: To what extent do you think our proposed approach to providing national-scale existing information about geology relevant to long-term safety is appropriate?**

We agree in general terms with the proposed approach, which is clear and also recognises the limitations of any national-level information that can be produced.

We welcome the role of Independent Review Panel (IRP) and external experts, who can help ensure the rigorous assessment of the process and the information provided. This in turn will increase public confidence in the veracity of what is produced.

We support the commitment to provide information on geology up to 20km off-shore. Some communities may have fewer concerns about the development of an under-sea repository than one directly under their community. That said, while the underground repository could be developed under the sea, communities will need reassurance that the surface facilities will be located in an area that is not vulnerable to sea-level rise or flooding.

We also welcome consideration of smaller areas that may not be able to host the full inventory (p14), but agree with the lower limit set on the size of suitable rock that must be available.

One area where we feel the guidance could be improved is in the explanation and representation of how a Geological Disposal Facility might be developed in either evaporites (salt) or lower strength sedimentary rocks (clays). Communities with these potentially suitable rock forms need further clarity about how a Geological Disposal Facility in such rock formations may differ in terms of its form and engineering.

**Question 2: To what extent do you think that these sources (of information) are appropriate and sufficient for this exercise?**

The information sources seem to be appropriate, and we are not aware of other sources that might be better.

That said, it is clear that there are significant gaps in the information, for example in relation to groundwater. The guidance and the geological information produced must be clear on these limitations and gaps, and explain how they will be addressed for any area entering into the siting process, including the likely timeframe for the information to be gathered. Any gaps or omissions in the data could be open to negative interpretation.

**Question 3: To what extent do you agree or disagree with the proposed form of the outputs from geological screening? What additional outputs would you find useful?**

We are not clear as to whether outputs based on regions aligned with British Geological Survey areas will provide the information at the necessary resolution i.e. will it enable a community to understand specific areas within their local authority boundaries that may be suitable/unsuitable?

Given the complexity of geology in some areas there is a need to represent information with as much clarity as possible at the community level. Human nature dictates that everyone will want to be able to place their community on the map and see how the information relates to them specifically. Maps should therefore include sufficient detail for people to be able to approximately locate their community. Maps should all be produced to the same scale.

If it is not possible to provide community level information at this stage then this must be clearly explained. Some indication of the level of work involved in providing more detailed geological information would help communities to gauge the impact of participating in the process.

As the guidance proposes, there is a need for both maps and visual representations as well as text description. Clearly, all visual information and text must be accurate but also as accessible as possible. We would propose the use of focus groups and other engagement with the public and professional groups (e.g. local authority planners) to take on board their views on how the information is represented before final versions of the information are issued publically.

**Question 4: Do you have any other views on the matters presented in the draft guidance?**

We support the provision of information on mines and hydrocarbon extraction below 100m and the commitment to the scope for the development of other activities such as fracking that may impact on the safety or security of a GDF. Further information on how, or if, such developments could co-exist within an area should be provided.

Given the wide awareness of Fukushima, the potential implications of seismic activity on a Geological Disposal Facility may well be a question in peoples' minds. An explanation of the magnitude and impact of any likely seismic event within the UK would therefore be beneficial to understand the level of activity here and the implications this may or may not have for a GDF. Information on the impact of seismic activity at the surface and depth should be provided, coupled with basic information on any regulatory responsibilities, such as they exist, associated with natural processes such as seismic events.

We would encourage RWM to avoid making any assumptions in producing the guidance, to follow the guidelines laid down by the Plain English campaign and to produce the guidance suitable formats so it can be accessed by all.

Continued engagement with NuLeAF, bringing as it does the views and concerns of local authorities with experience of nuclear legacy issues, would be beneficial to the GDF process as it develops.

I trust that these comments are of use in developing the Guidance further.

Yours faithfully,

A handwritten signature in black ink, reading "Philip Matthews". The signature is written in a cursive style with a large initial 'P'.

**Philip Matthews**  
Executive Director