



National Geological Screening Consultation
Radioactive Waste Management
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National Geological Screening Guidance - providing Information on Geology

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including residential and business users.

EDF Energy welcomes the opportunity to comment on this activity, which forms one of the key programmes of work to be undertaken at this stage of implementation of the 2014 White Paper on Implementing Geological Disposal. We would stress the importance of adopting an open, inclusive and accessible approach to the provision of information which may help communities in their decision-making. It is also vital that this aspect of the work is closely aligned with the other activities which the Department of Energy and Climate Change is taking forward in parallel.

The task of implementing Government policy on radioactive waste management, and in particular taking forward the development of a Geological Disposal Facility is of strategic national importance. We therefore look forward to supporting Radioactive Waste Management Limited in carrying out the work that it is tasked with through the 2014 White Paper on Implementing Geological Disposal.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact Nigel Knee on 020 3219 6640, or myself.

I confirm that this letter and its attachment may be published on Radioactive Waste Management's website.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Angela Hepworth'.

Angela Hepworth
Corporate Policy and Regulation Director

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Attachment

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EDF Energy's response to your questions

Q1. To what extent do you think our proposed approach to providing national-scale existing information about geology relevant to long-term safety is appropriate? Please give your reasons.

The identification of areas of the UK which may provide suitable geological conditions for the disposal of radioactive waste is a complex exercise and will need to draw on a wide range of technical expertise and resources. Sections 3.4 and 3.5 of the consultation document consider the safety requirements at a high level principle level.

These high level principles will need to be worked through in detail to assess the long-term safety of a specific disposal system and geology. The information given in the consultation document on safety requirements is not sufficient, on its own, to determine how compliance with these safety requirements will be judged, and therefore whether all the relevant geological attributes have been identified.

Greater confidence that the relevant attributes have been identified would be gained if more information was provided about how – in principle at least - the geological attributes are related to the different safety requirements. We would recommend that this is explained further in the response to consultation.

Nevertheless, the attributes in Table 2 should provide a suitable framework to assess an area. As the consultation makes clear, the relative paucity of information about the geological conditions at depth in much of the UK means that firm conclusions about the suitability or otherwise of specific regions are unlikely to emerge from this exercise. As such, this phase of the work is more accurately described as a characterisation study rather than a screening exercise.

Q2. The proposed sources of information are summarised below.

To what extent do you think that these sources are appropriate and sufficient for this exercise? Please give your reasons.

The primary source of information is various reports from the British Geological Survey, as the keeper of the majority of the data about UK geology. Greater confidence in the consultation exercise and screening process would be achieved if the role, status and reputation of BGS were included within the consultation. Similarly the credentials, in terms of expertise and independence, of the Independent Review Panel should be explained more fully.

The basis for selecting the specific resources should be explained, including a consideration of any BGS or third party geo-science resources that were considered as not relevant to the screening exercise (for example because they have not been subject to the quality assurance/validation processes that BGS routinely apply).

Q3. 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?

There are two key requirements for outputs from geological screening:

- (a) Clarity of the conclusions on suitability (or otherwise) of specific locations.
- (b) Accessibility of the outputs to non-specialist audiences.

Clarity of conclusions

The outputs will be of limited value if they do not allow local communities to form a view about the prospects of the local geology being ultimately suitable for a GDF. The proposed regional narratives must be written in a way that provides enough information to communities and local authorities to allow them to take a view on the prospects relevant to their local area.

It is important to take into account that most local authorities will have little or no specialist geological or radiological safety expertise to call on to assist their decision-making processes. It is therefore essential that the narratives for each region (or parts of the region) are written in such a way that conclusions are as unambiguous as possible, and do not require specialist interpretation.

While we accept that it is unrealistic to expect definitive answers regarding the suitability or otherwise of specific locations, it is important that the narrative relates the geology of the region to the safety requirements, and is not simply a description of the geology.

Accessibility of the outputs

The language used must be accessible to non-specialists within local authorities and to interested members of the public. It may be necessary to provide additional information in the form of FAQs or a query line to assist local communities with interpretation of the regional narratives.

While it is accepted that the use of geological terms is unavoidable in order to provide precise information, this must be accompanied by a plain English summary. Guidance on interpretation of the narratives for communities that lie on or near the boundary between two or more regions will be important.

Outputs must be readily accessible via the internet, without recourse to a fast broadband connection. Paper copies of key documents should be available to local authorities and parish councils on request.

Q4. Do you have any other views on the matters presented in the draft Guidance?

Authoritative information on geology, and its relevance to meeting the safety requirements for a GDF is an essential part of the process of identifying potentially suitable sites. However, it is important to communicate to local communities that it is only one part of the programme that the Government is taking forward as set out in the 2014 White Paper on Implementing Geological Disposal.

**EDF Energy
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