

Annex A: Response form for the consultation document on revised Funded Decommissioning Programme Guidance for New Nuclear Power Stations

You may respond to this consultation by email or by post.

Please note that if you accessing this document electronically you will only be able to enter text in the response fields.

Respondent Details	
Name:	Piers Manson
Organisation:	
Address:	
Town/ City:	
County/ Postcode:	
Telephone:	
E-mail:	
Fax:	

Please return by 8 March 2011 to:

Revised FDP Guidance Consultation
Office for Nuclear Development
Department of Energy and Climate Change
Area 3D
3 Whitehall Place
London
SW1A 2AW

You can also submit this form by email:
decomguidance@decc.gsi.gov.uk

Tick this box if you are requesting non-disclosure of your response. ☐

Consultation questions	
1	<p>Do you agree or disagree that the draft guidance sets out what an approvable Funded Decommissioning Programme should contain to ensure that operators of new nuclear power stations (i) estimate the potential costs of decommissioning, waste management and waste disposal and (ii) make prudent provision for meeting their liabilities? What are your reasons?</p>
Response	<p>I disagree.</p> <p>Whereas the guidance accurately interprets the underlying assumptions that are set out in the consultation document, I would challenge some of the technical aspects of these assumptions on the grounds of narrowness and rigidity.</p> <p>This consultation is part of a framework that the Government is setting in place to enable the development of a market for nuclear power generation. However, the current narrowness and rigidity of the assumptions made does not allow the future market to do what markets do best, namely to innovate.</p> <p>Specifically:</p> <ul style="list-style-type: none"> - there is a specification that future fuels will be based on uranium or uranium oxide. To specify this so narrowly does not allow the development of other potentially superior nuclear fuels, e.g. mixed oxide fuels, thorium based fuels or other uranium based fuels such as uranium carbide. Any future deployment of these innovations should be readily allowable and ample regulatory scrutiny of safety and environmental aspects is already provided for. To respond to this point by arguing that any future development in fuel design can go through the sort of consultative process that we are currently engaged in is to be excessively bureaucratic. - the consultation specifies that the future option for spent fuel is that it is encapsulated for disposal. Encapsulation is a very specific form of treatment for disposal and it may be that other treatment options are preferable. A less prescriptive word such as "preparation" or "treatment" should be used. - the guidance does not allow for ILW or spent fuel to be disposed of during the operational phase of a nuclear power plant. I recognise that this is financially conservative and therefore attractive. However, it is likely that disposal of ILW and of spent fuel will be possible during the operational lifetime of new nuclear power plants. If the operator can secure disposal of spent fuel and operational ILW during the operational phase of a new nuclear power plant, then the framework should allow them this opportunity.
2	<p>Does the draft guidance contain sufficient information to enable operators of new nuclear power stations to understand the matters that their funded decommissioning programmes should contain?</p>

Response	Yes
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Please select the category below which best describes who you are responding on behalf of.

- ☐ Business representative organisation/trade body
- ☐ Central Government
- ☐ Charity or social enterprise
- ☒ Individual
- ☐ Large business (over 250 staff)
- ☐ Legal representative
- ☐ Local Government
- ☐ Medium business (50 to 250 staff)
- ☐ Small business (10 to 49 staff)
- ☐ Micro business (up to 9 staff)
- ☐ Trade union or staff association
- ☐ Other (please describe):

Thank you for taking the time to let us have your views. The Government does not intend to acknowledge receipt of individual responses unless you tick the box. ☐

Department of Energy and Climate Change