

## **Response by Oldbury Site Stakeholder Group**

## Consultation questions

1

Do you agree or disagree that the draft guidance sets out what an approvable Funded Decommissioning Programme should contain to ensure that operators of new nuclear power stations (i) estimate the potential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?

Response

YES

Primarily because the Government is, after all, the final arbiter & will control regulation/licencing etc & will no doubt, during the operating life of 'newbuild' plants, have to revisit the whole issue because unforeseen events are likely to occur in a half century. So I am happy the document is not prescriptive.

The decommissioning costs of a plant will, relatively, not change much from year one of operation. If, for whatever reason, a plant had to close in its first few years & not due to a fault of the operator, the fund would presumably not be sufficient — or does the operator have to have the total decom. cost available from year one without the benefit of decades of income/profit?

I would like the possibility of spent fuel being reprocessed to be recognized, as over 50-100 years technical advances are likely to make this attractive — especially in the light of the plutonium consultation suggesting it is an asset.

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| 2        | Does the draft guidance contain sufficient information to enable operators of new nuclear power stations to understand the matters that their funded decommissioning programmes should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?   |
| Response | <p>Generally - yes</p> <p>Some issues in the 'Base Case' assume too much whilst I applaud the GDF nettle having at last been grasped, the <del>lack</del> lack of any info about a 'Plan B' if volunteerism fails at the last hurdle is an uncertainty. Any delay followed by ~ 30 years to deal with legacy waste could mean 'Newbuild' operators being responsible for their waste for an extended (&amp; expensive) period.</p> <p>Another issue discussed 'at table' was spent-fuel encapsulation "carried out on site". Spent-fuel albeit less radioactive, has been moved around for 40+ years &amp; current major thinking is to study if one expensive plant could handle waste at one central site or could be moved to the waste if that is preferable. The possibility to utilise new technology that should be available, certainly over a 100 year period should be included not-excluded.</p> <p>I note page 47 or early closure will presumably be covered by insurance - re my comments on question 1 here.</p> |