

Consultation on revised Funded Decommissioning Programme Guidance for New Nuclear Power Stations: response from EnergySolutions EU Ltd

Dear Sir/Madam,

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 *Do you agree or disagree that the draft Guidance sets out what an approvable Funded Decommissioning Programme should contain to ensure that operators of new nuclear power stations (i) estimate the potential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 (i.e. the designated technical matters) and (ii) make prudent provision for meeting their liabilities? What are your reasons?*
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 *Does the draft Guidance contain sufficient information to enable operators of new nuclear power stations to understand the matters that their Funded Decommissioning Programmes should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?*

EnergySolutions welcomes the chance to respond to the Consultation in this important area. Our response is a top level one, as ultimately it is for the potential operators of new nuclear power stations themselves to judge whether they have enough information on which to proceed. Based on our experience, both here and in the United States, however, we believe that the draft Guidance represents a sensible and sound basis on which to proceed.

As waste and decommissioning specialists we have been involved in both the preparation and execution of decommissioning programmes for many years. In the United States, where EnergySolutions is headquartered and has the bulk of its business, activities in this area are probably some ten years ahead of where we are in the UK. Here in the UK, the most advanced decommissioning programme relates to the Magnox reactors and we are responsible, under contract to the Nuclear Decommissioning Authority, for managing and operating 22 of the reactors across 10 sites. Drawing on this practical experience, we would make the following observations on the draft Guidance:

- A process such as this one, where the thinking on how the decommissioning and waste management will be funded and carried out is done at the very beginning, is very valuable and we would encourage the Department in its full implementation. Building in early drivers on the waste will ensure that the issue gets the necessary focus and attention from all sides, that the full associated costs are built into the potential operators' business plans, and that the risk of a future call on the public purse is minimised.
- The level and quantity of information covered by the Guidance is in line with that necessary to prepare robust and comprehensive funded decommissioning programmes for nuclear power stations. With the exception of implementing final spent fuel disposal, we have experience in all the areas covered in the Guidance and the level of detail requested – both on the costs and the designated technical matters – is consistent with that contained in existing approved and successfully implemented programmes.
- Within the final Guidance that is eventually given to potential operators of new nuclear power stations and in the requirements asked of them, we would recommend allowing the maximum amount of flexibility possible. Within the time frames covered by the lifetime of a

nuclear power plant and the following clean-up and waste management operations many current norms, practices, and technologies can change, giving plant owners or operators the opportunity to make time and cost savings. Therefore provisioning for, for example, alternative final disposal routes for certain waste streams, changes to packaging assumptions, or alterations to future on-site infrastructure needs will, potentially, allow operators to drive down the costs of managing their waste whilst still meeting their safety and environmental obligations.

- The oversight and verification processes that follow the issuance of the final Guidance and that will go alongside the production of the FDPs themselves will be vital in ensuring they are sufficiently robust and properly resourced. This cross-checking and monitoring must be on the technical aspects of the Programmes, as well as the financial and cost components, with read across from one to the other to ensure proper and full progress. This will necessitate the involvement of sector specialists, as well as financial auditors.