

## Response from D. Viesnik

Dear Sir/Madam,

I wish to adopt and endorse the attached responses from Kick Nuclear to the DECC consultations on the revised Funded Decommissioning Programme guidance and an updated Waste Transfer Pricing Methodology as my personal responses to the respective consultations.

I would be grateful if you would acknowledge receipt.

Kind regards,  
D. Viesnik

On behalf of Kick Nuclear:

This is a collective response from *Kick Nuclear*, a London-based group established in 2010 to campaign against nuclear power and support sustainable alternatives. Eight regular members of the organising group have had the opportunity to contribute to this document.

We completely oppose any new nuclear build in the UK.

We believe that any long-term storage facility should be for legacy waste only. In the event that any new nuclear reactor(s) is/are given the go ahead, we agree that the operator(s) must bear the full financial burden of waste and spent fuel management and disposal, and make adequate provision for these costs from the outset, without risking future recourse to public funds.

A key assumption is that one or more UK repositories for legacy and new build waste will be built, to schedule and to cost. This is by no means guaranteed: there are formidable technological and political barriers to be overcome in the construction of any Geological Disposal Facility (GDF) capable of safely isolating radioactive waste from the environment for thousands of years, which may not actually be technologically feasible.

Although the operator is required to make 'prudent provision' for funding the Waste Transfer Price (WTP), what redress will there be if it is unable to pay, or avoids paying, its full share?

Accidents of varying degrees of severity can and do happen, including a Chernobyl- or Three Mile Island-type reactor meltdown. Are such eventualities factored into the

Government's calculations?

The operator can at any time choose to fix the Final Price at the level of the Cap. In the event that this is less than the actual cost, any shortfall over and above the Cap (plus Risk Premium) would presumably have to be met from the public purse, which would not be acceptable.

If fewer reactors are built than envisaged, would there be a resulting shortfall in funds available for construction of waste disposal facilities? How would the financial risks to the public of any such shortfall be avoided?

We think it would be better for the Government not to set a Cap but to instead take appropriate measures to ensure that operators are made to pay the full *actual* costs of disposing of their waste / spent fuel, constructing facilities for this purpose and safely managing and securing their waste / spent fuel once the Government has taken title to it and prior to final disposal.

Overall, more clarity and information are needed from Government on how costs have been estimated and modelled and risks determined, including more detail about underlying assumptions.