GKN

B.V. Gemeenschappelijke Kernenergiecentrale Nederland

Plutonium Consultation
3rd Floor, Area C/D
Nuclear Policy Unit
Department For Energy and Climate Cahnge
3 Whitehall Place
LONDON
SW1A 2AW

Uw kenmerk	Ons kenmerk	Behandeld door	Doorkiesnummer
	DR 11-054	G.J.G. Geertsema	

Onderwerp	Datum
Management of the UK's plutonium Stock	15th April, 2011

Dear Madam, dear Sir,

We understand that the UK Government is currently reviewing its options for the management of UK stocks of plutonium. In particular we note that the consultation document makes reference to overseas owned plutonium stored in the UK which has arisen from the reprocessing of irradiated fuel under reprocessing contracts. As a long standing overseas reprocessing customer of NDA with contractual obligations related to storage and management of plutonium arising from reprocessing, B.V. Gemeenschappelijke Kernenergiecentrale Nederland ("GKN") would support the proposed approach including overseas owned plutonium stored in the UK within the UK's overall strategy going forwards. In general, we are in favour of a process for dealing with sensitive nuclear material such as plutonium in an environmentally acceptable way that conforms to international safeguards regulations. More specifically, we would support the recycling of plutonium (i.e. its reuse as MOX fuel) as proposed in DECC's preliminary conclusions within the Public Consultation document.

In response to your request for views on particular areas, our comments are as follows:

Q1. Do you agree that it is not realistic for the Government to wait until fast breeder reactor technology is commercially available before taking a decision on how to manage plutonium stocks?

In GKN's view, there is considerable uncertainty regarding the development of fast breeder reactor technology and its implementation on a commercial scale and also in which countries that might first happen. By contrast it is our understanding that MOX fuel is a viable and proven route for the use of plutonium in existing reactors in several countries. It is not therefore appropriate, in our view, for the UK Government to wait for fast breeder technology to be commercially available before taking a decision on the options for how best to manage its stocks of plutonium.

Q2. Do you agree that the Government has got to the point where a strategic sift of the options can be taken?

The UK Government has made a number of decisions and public statements in respect of its intentions related to New Build in the UK. Decisions on the types of reactors should be accompanied by decisions on the types of nuclear fuel that these reactors should be capable of burning and the scope of their operating licences. If MOX fuel is to be included as an option it is clearly an appropriate time for the UK Government to undertake a review of the options for the management of its plutonium stocks, including recycling the plutonium as MOX fuel.

Q3. Are the conditions that a preferred option must in due course meet, the right ones?

The criteria appear to be those relevant for the UK Government to make a decision. As far as we can judge these criteria are comprehensive and appropriate. We consider that these criteria are consistent with those which might be used to make decisions on similar nuclear matters in the Netherlands, or elsewhere.

Q4. Is the Government doing the right thing by taking a preliminary policy view and setting out a strategic direction in this area now?

Yes. GKN welcomes the fact that the consultation document also includes at this time references to overseas owned plutonium.

Q5. Is there any other evidence Government should consider in coming to a preliminary view?

No. We consider the evidence referenced in the consultation document to be comprehensive for the purposes of making a decision on the management of UK stocks of plutonium.

Q6. Has the Government selected the right preliminary view?

Yes.

Q7. Are there any other high level options that the Government should consider for long-term management of plutonium?

No. The high level options identified are comprehensive in terms of availability and technical maturity.

Sincerely Yours,

Gert Jan G. Geertsema
Managing director of
B.V. Gemeenschappelijke Kernenergiecentrale Nederland