Respondent Details	
Name:	Committee on Medical Aspects of Radiation in the Environment (COMARE)
Organisation:	

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)
☐	Micro business (up to 9 staff)
☐	Small business (10 to 49 staff)
☐	Trade union or staff association
X	Other (please describe): **COMARE is an independent expert advisory Committee**

The consultation document sets out the Government's proposed approach to the longer term management of the UK's plutonium stocks for public scrutiny and consultation. Comments on any aspect of this issue are welcome, but the key questions posed in this consultation are:

No	Question
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?
Response	**Yes, as there are no plans to develop Fast Breeder Reactors in the UK.**
Q2	Do you agree that the Government has got to the point where a strategic sift of the options can be taken?
Response	**Yes. The Nuclear Decommissioning Authority (NDA) has been considering what to do with plutonium stocks since it was established in 2005 and was asked to determine credible options in 2007 (3.5). It published an options paper in 2009 (which included conclusions from technical workshops and from papers that had been published for comment) and has updated this document. The time is right to move on.**
Q3	Are the conditions that a preferred option must in due course meet, the right ones?
Response	**Yes. The conditions comprise: achievability; deliverability; capability of meeting health, safety and environmental requirements; capability of achieving non-proliferation and security objectives; provision of value for money and overall benefit (5.3). These conditions are wide-ranging and appropriate.**
Q4	Is the Government doing the right thing by taking a preliminary policy view and setting out a strategic direction in this area now?
Response	**Yes. Taking a preliminary view acknowledges the uncertainties (thus allowing a change in policy if new information becomes available) while still encouraging attention to be focussed on the most likely best solution (5.2 and 6.8 – 6.10).**

Q5	Is there any other evidence government should consider in coming to a preliminary view?
Response	**Yes – it is important to consider the full radiological and health implications of the different options together with any security issues.** **COMARE would like to see dose estimates for both workers and the public, together with some more detailed risk assessments for each stage of the different options. It is particularly important to consider the impact of the in-growth of americium-241 from plutonium-241. This in-growth means that there are ever increasing shielding and handling problems with aging plutonium as americium-241 on decay emits gamma radiation.**
Q6	Has the Government selected the right preliminary view?
Response	**Yes, based on the information provided in the document, and recognising the need for further work on the options. It is also important to get costs right and take account of all factors.** **The Committee notes that the proposed solution assumes the timely availability of the UK MOX plant at the planned cost, bearing in mind the poor performance of the existing UK plant and delays in the US plant.** **COMARE conjectures whether there would be costs charged by operators (or subsidies required) to utilise MOX?** **It appears that the AREVA MOX fabrication plant in France has spare capacity (3.9) and it is surprising that there is no mention of the possibility of using this to convert UK plutonium (possibly as an interim measure until a new UK plant is operational). However, it is acknowledged that there would be safety and security issues as regards the packaging and transportation of the material from the UK to France.**
Q7	Are there any other high level options that the Government should consider for long-term management of plutonium?
Response	**No, not as far as we are aware.**