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UK Government Consultation on Plutonium

May 3, 2011

Dear Madams and Sirs,

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 currently 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, EnBW supports recycling and therefore would support an approach for the UK to include overseas owned plutonium within its overall strategy going forwards provided that this were to lead to recycle of EnBW's material in the civil nuclear fuel cycle.

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 EnBW'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 use of plutonium in existing reactors in very many countries. It is not therefore realistic 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.

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*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 the correct timescale for the UK Government to undertake a review of the options for the management of its plutonium stocks including recycle 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 EnBW 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 other countries.

*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. EnBW also welcomes the fact that the consultation document includes references to foreign owned plutonium.

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

No. EnBW 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. German Utilities are required by the German Government to satisfy its Proof of Use criteria which relate to the viability of potential routes for the management of plutonium. The preliminary policy view (i. e. use of plutonium as MOX fuel) outlined in the consultation document appears to be broadly consistent with the Proof of Use requirements.

*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 both in terms of availability and technical maturity.

Yours Sincerely

EnBW Kernkraft GmbH