

There should not be a fixed unit price for waste disposal, as we do not yet know how or where this disposal will take place, or, indeed, if it can be disposed of safely.

Chapter 3: the methodology to determine a Fixed Unit Price.

Question 1: Do you agree or disagree that prospective operators of new nuclear power stations should be given the option to defer the setting of their Fixed Unit Price.

Answer:

I disagree that there should be either a FUP or an eFUP.

We cannot now determine a price and it is certainly not fair that, should a price be fixed, the tax-payer should have to pay the extra come the time the waste needs to be disposed of. I gather that EDF think that 20% is as much as they consider they should be responsible for, in terms of cost. How can we say that the public is not to subsidise nuclear power and have this consultation, which is asking that the Government take liability for waste and cap the cost to the operator of waste disposal?

The exact designs for spent fuel stores may not be in place until well after reactor operations have started, according to The Committee on Radioactive Waste Management. Encapsulation is a particularly problematic stage in the process. The consultation states that "uncertainty is considerable, particularly around the cost of encapsulation, and hence the additional risk premium would be large."

Question 2: Do you agree or disagree with the proposal that the Schedule for the Government to take title to and liability for an operators waste should be set in relation to the predicted end of the decommissioning of the nuclear power station?

Answer:

I disagree.

We already have a £4b hole to fill to cover decommissioning of the existing nuclear power stations. Are there not lessons to be learned from this? It is being proposed that existing power stations have their lifetimes extended, to cover the cost of decommissioning. This is expediency and not putting safety first, as the nuclear industry and the NDA would have us believe is the case.

As we do not know the nature or quantity of high burn-up fuel waste, from new nuclear build and whether or not it can be disposed of with legacy waste, it is not right that the Government ( whoever that might be at the point when the waste has cooled down enough) should take on liability for the waste at the point of decommissioning and when there may not yet be an answer to the problems of waste disposal in a GDF.

Operators must remain financially and legally liable for their waste and spent fuel until it can be disposed of - presuming there is an answer found!

Question 3: Do you agree or disagree that the proposed methodology to determine a Fixed Unit Price strikes the right balance in protecting the taxpayer, by taking a prudent and conservative approach to cost estimation while facilitating new nuclear build by providing certainty to operators?

Answer:

Too many uncertainties remain to say that the methodology protects the taxpayer and we should not be "facilitating new nuclear build" when there are so many dangerous uncertainties.

We have at present before us the scenario with BP, where there is a question over whether safety was put before profits and whether the company is liable for the impact of the accident now contaminating the Gulf Coast. There are also questions around why the accident was not seen as a possible risk and known solutions to the possibility of its happening put in place.

All these questions arise with this apparent move towards new nuclear power stations going ahead, with these attempts at fixing the price of the hazardous nuclear waste, before we even know what the hazards and the true cost might be. This speaks of encouraging the nuclear industry, fixing profit margins and allowing the public to bear both the financial and safety risks, in exactly the same way. It is not morally or financially acceptable.

Question 4: Do you agree or disagree with the proposed approach to determining an operator's contribution to the fixed costs of constructing a Geological Disposal Facility?

Answer:

We do not know where or how such a facility may come about. When we know the answers, then we can cost it and then we will know what the operators are liable for and then they can pay the price. This will include ongoing care and monitoring of the facility. It is unlikely that any operator would last long enough to oversee such a project.

So, it is not possible for us to safely say that an operator can be financially responsible and according to present government policy, this makes the project untenable.

Questions 5 and 6:

There are too many unknowns to answer either of these questions.

FROM

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