Dear Sir / Madam

Thank you for the opportunity to respond to the consultation on the proposed justification process for the resuse of plutonium.

It is unclear from the consultation if the proposal will include the additional 4 tonnes of German Plutonium alongside the management of the UK's Plutonium stock pile, some clarity is sought on this issue.

Question1:

Consultation Question One – Do respondents agree with the Government's view that it is sensible to issue generic guidance for the reuse of plutonium? We welcome comments on this proposed approach.

Yes the Council would agree that as there are still a number of technologies being explored that could also seek justification then it would appear practical to issue generic advice which will be applicable to all potential technologies.

Question Two:

Are the proposed application and decision-making processes clear, appropriate and proportionate? If not, how can they be improved?

- The proposed justification process appears to be a logical sequential process.
- It would be helpful for clarity to explain what the existing class or types are that may not require justification; it is assumed that this refers to MOX?
- The Council would have a greater degree of confidence in the process if ALL types of practice were reviewed regardless of whether they are new or existing. It is recognised that existing technologies may not require the same level of scrutiny however a review of the justification of the practice would ensure credibility and afford consultees the opportunity to make representations on the process.
- It is recommended that the relevant local authority that will host the proposed facility is also included in the list on consultees.

Question Three:

Is the indicative list of information in Table 3 sufficient and appropriate to assist in the making of justification applications and justification decisions? Does the indicative list omit any relevant information, or include any unnecessary information?

- Under the section economic, societal or other benefits and detriments in table 2, it is recommended that there is included a section to assess the socio-economic impacts of the proposed development on the local community, where the proposed facility will be located.
- An indication of the types of associated community benefits including skills needed and resources needed to design and operate the facility. If these are readily available within the UK, the potential volume of jobs created and if the skills and resources are not currently readily available how they intend to relieve this problem.
- An indication of where the potential technologies could be located so that any future justification process could engage with the relevant local community.

Question Four:

Are there any other ways in which the draft justification process can be improved? If so, how?

- Socio-economic benefits of each type of proposal are a fundamental part of the assessment and it is right that they remain a key part of the justification process.
- Any justification process must recognise that impacts of the proposed technology will be felt in a specific location and where possible generalisations about costs and potential benefits should be area specific and avoid generalisation.
- In order to ensure that a full assessment is carried out the full extent of the socio-economic impacts of a proposal on the local community where the proposed development will be located must be examined at this stage.
- Unambiguous information needs to be provided regarding the costs and benefits of the proposal, to a specific area.
- Ensure that the process remains open and transparent and that the local authority has an opportunity to comment on the justification process. If this is achieved and assuming that detailed information on the socio –economic implications is provided, as outlined in question 2, with the assessment then the proposed process appears acceptable. It allows for flexibility and requires adequate information to make a robust assessment.

I hope that the above information is useful and look forward to receiving your response in due course.

Yours Faithfully