MANAGEMENT OF THE UK'S PLUTONIUM STOCKS

Response form for the consultation on the proposed justification process for the reuse of plutonium

Respondent Details
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Organisation: AREVA

The purpose of this consultation is to outline, and seek views on, the proposed application and decision making process for a justification decision under the Justification of Practices Involving Ionising Radiation Regulations (2004) concerning the reuse of the UK's stockpile of separated civil plutonium

Q1 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

Response We do think that it is essential to provide guidance for the reuse of plutonium. However guidance should acknowledge and take into account the availability and readiness of various solutions in the short/medium term, in order to avoid being too generic and therefore less effective and prone to dispute.

Q2 Is the proposed application and decision-making process clear, appropriate and proportionate? If not, how can they be improved?

Response The proposed application and process are clear. The important point is the respect of the a defined schedule to allow a proper planning of all activities

Q3 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?

Response The list is sufficient and appropriate. Moreover applicants should not provide generic information only, but also proofs and evidence of existing or similar activities so that the provided information can be confirmed.

Q4 Are there any other ways in which the draft justification process can be improved? If so, how?

Response We do think that separate justification decisions for each application should be preferred.