MANCHESTER 1824
The University of Manchester
Dalton Nuclear Institute

MANAGEMENT OF THE UK'S PLUTONIUM STOCK

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

Dalton Nuclear Institute, The University of Manchester

1. 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.

It is sensible to produce generic guidance. It is not yet clear what the final technology choice(s) will be for re-use of the UK plutonium stockpile. Generic guidance accommodates these options in a way which guidance on specific technologies would not and is therefore likely to be a more efficient and flexible approach.

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

The proposed process does appear clear, appropriate and proportionate. It is important that the public has confidence in the process, and openness and transparency are critical elements in building that confidence. In this context, we note the statement in Paragraph 31 that information may be redacted. The extensive redaction of NDA's documents on plutonium credible options before publication has significantly diminished trust in them, so redaction should be seen as a last resort. It should only be used where the information is genuinely not otherwise available (in particular, much supposedly sensitive information is easily found on the internet) or where there are other good reasons to do so. Extensive redaction of financial information makes financial arguments behind particular decisions opaque, which is undesirable, especially in this case, where cost is certain to be a major consideration. Government should make clear the criteria for redaction, which should be used only to the minimum extent necessary and, where documents are redacted, there should be a clear explanation of the reasons why this has been done.

3. 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?

It is right that the applicant should have freedom to make an application in whatever form that they see fit, and that Government is not excessively prescriptive. The information listed is likely to be sufficient and appropriate but allowing flexibility for applicants is important. It seems to be implicit that justification may well be an iterative process, with two-way dialogue between Government and applicant before a final decision is reached, and it might be worth stating this explicitly to avoid the perception that the applicant had 'got it wrong the first time, and had to revise their application'.

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

Not in our view.