Please find below my comments. I am responding as Head of Capability for DBD Limited, which is a small/medium enterprise providing technical expertise to both the nuclear and non-nuclear sector. This expertise includes decision making and optioneering support to clients. These comments have been developed through discussions amongst the companies experts in this area

Regards

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.

The introduction to the consultation document makes clear (paragraph 6) that the reason for initiating the justification process is the NDA intention (as of 13th April 2012) to make an application for justification in relation to the reuse of plutonium. The justification would relate to the practice involving the conversion of plutonium into MOX fuel for irradiation in reactor types which have been through the Generic Design Assessment (GDA) process and received interim Design Acceptance Confirmations and interim Statements of Design Acceptability (iSoDAs). Furthermore, an objective of the process is given (paragraph 5) as the need to secure justification of the whole MOX treatment path before proceeding with the procurement of a new MOX plant.

However, on 27th June 2012 NDA announced that, following a number of submissions proposing several alternatives to the reuse of plutonium via the MOX route, further consideration is being given to two other options for the reuse of plutonium (i.e. the potential use of the GE Hitachi PRISM reactor and the Candu reactor).

Given the major differences between these options and the MOX route it does not seem sensible to issue generic guidance on the basis described in the consultation document until the work to study these additional options has been completed and a preferred option has been confirmed.

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

The need for justification is understood. However, the selection of an option for the reuse of UK plutonium stocks which provides the best overall value practice and the justification of that practice are inextricably linked and should form part of a clear and rigorous decision making process.

Currently, the selection of a preferred option and its subsequent justification are being managed in discrete steps. It is hard to see how the decision criteria in any rigorous process to select a practice which is the best value option would not also encompass the criteria which would be relevant to the justification of that practice and hence there is the potential to combine the decision steps.

Whatever way forward is taken it must allow for a full and rigorous assessment of all aspects of the credible options for reuse of plutonium stocks, including Candu and PRISM alongside MOX, against all the relevant decision criteria necessary to establish the best overall value.

The validity of the NDA work which established MOX as a preferred option is now at risk, especially since the PRISM option was initially screened out prior to the NDA application for MOX justification but is now under further consideration.

It is noted that the MOX route is only considered to be suitable for some of the total UK plutonium stocks and therefore additional solutions to manage the rest will be needed to form a complete solution. Unless all the credible reuse options have the same limitations, the decision making process should address any additional processing requirements which will be needed to form a complete solution.

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?

The list of information depends on having clarity about the specific requirements for justification versus the overall decision on what, ultimately, will be the best value option. It is likely that the information list in Table 3 applies to both decisions yet does not fully meet the needs of either. If the decision making process continues to tackle these as discrete decisions it needs to avoid the potential for conflicting information and outcomes.

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

See response to Q2