CORE

Cumbrians Opposed to a Radioactive Environment

19th August 2012

Consultation reference: URN 12D/075
A consultation on the proposed justification process for reuse of plutonium.

The following response is made by CORE (Cumbrians Opposed to A Radioactive Environment). The response reflects the views of CORE's local, national and international members and supporters.

Question One: Do respondents agree with the Government's view that it is sensible to issue generic guidance for the reuse of plutonium?

No. This public consultation on the proposed justification process for the re-use of plutomium is highly premature. Consultation questions 2,3 & 4 are therefore irrelevant and no response is therefore provided.

The timetable of events (outlined below) gives the clearest insight into the confusion which clearly pervade official thinking on which plutonium management option to pursue. Accordingly, CORE considers not only that this consultation is premature but also that it should be withdrawn until such time as both Government and the Nuclear Decommissioning Authority (NDA) are able to demonstrate to stakeholders that they are 'singing from the same hymn sheet' on potential plutonium management options. The recent re-opening of the plutonium management optioneering process by the NDA – via its U-turn on fast-breeder reactor technology and its current review of the PRISM proposal by GE-Hitachi (GEH) - provides no such demonstration.

The current absence of any attempt by Government/NDA to explain the diversion from its preferred re-use option to one of eliminating the UK plutonium stockpile via 'burning' in a fast reactor wholly undermines confidence in the Government and NDA's previously selected preferred option of re-use as MOX. Further, the re-opening of the doors of the plutonium management optioneering process via the PRISM review, undertaken with no input from stakeholders, makes it incumbent upon Government and NDA to re-asses also, as a logical and urgent necessity, those plutonium immobilisation options earlier identified by the NDA as having potential - on the grounds that some immobilisation variants are equally, if not more, technically mature than the PRISM concept which still languishes at the design stage, and are likely to be equally cost-effective as the MOX option.

A failure to conduct such a re-assessment will further highlight the lack of transparency and objectivity that currently engulfs Government and NDA actions on management of the UK's plutonium stockpile, as evidenced by the following timetable of confusion.

Timetable of confusion.

February 2011. The NDA screens out the fast reactor option as not being credible

1st December 2011, Government confirms that the re-use of plutonium via MOX fuel is its preferred option.

23rd February 2012 - barely three months after the Government's confirmation of the re-use as MOX option - the NDA announces it is seeking proposals for alternative approaches for managing UK's plutonium stocks. No reason for the potential move away from the re-use option was provided.

3rd April 2012 the NDA signs a Memorandum of Undestanding (MOU) with GEH to enable a more detailed assessment of the PRISM fast reactor proposal. No explanation was provided by the NDA as to why its earlier rejection of fast reactors had been overturned.

13th April 2012 - just ten days after signing MOU with GEH - the NDA advises Government of its intention to make application under Regulation 9 of the Justification of Practices Involving Ionising Radiation Regulations (2004) for the re-use of plutonium via MOX fuel. The intention of making such an application cannot be reconciled with the decision to sign up with GEH for a proposal that requires further months of review of a concept that represents a genuine alternative to the re-use as MOX option.

28th May 2012 the Government launches the current public consultation on the proposed justification process for reuse of plutonium. This not only pre-empts any conclusion by the NDA on its ongoing assessment of the GEH PRISM proposal but also provides no information for stakeholders on the impact that the NDA's potential acceptance of the PRISM proposal would have on the Government's currently preferred re-use as MOX option.

From the above, CORE concludes:

- **that this consultation is premature**
- **that it would be wholly illogical for Government to pursue the consultation further until such time as an NDA decision on PRISM is reached**
- **that it should be pursued only after immobilisation options have also been re-visited and their potential – based on latest evidence – has been transparently re-assessed alongside the PRISM fast reactor and the re-use as MOX options**