

Nuclear Industry Association response to DECC's Call for Evidence: Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility

The Nuclear Industry Association (NIA) welcomes this opportunity to respond to the Department of Energy and Climate Change's call for evidence.

NIA is the trade association and information and representative body for the civil nuclear industry in the UK. It represents around 270 companies operating in all aspects of the nuclear fuel cycle, including the current and prospective operators of the nuclear power stations, the international designers and vendors of nuclear power stations, and those engaged in decommissioning, waste management and nuclear liabilities management. Members also include nuclear equipment suppliers, engineering and construction firms, nuclear research organisations, and legal, financial and consultancy companies.

Some of these companies, particularly the generators and those involved in the fuel cycle, will be making their own submissions to this consultation. The purpose of this NIA response therefore is to make some higher level points.

Overview

The UK's nuclear power stations have been making a major contribution to the UK's energy supplies for over 50 years. Their provision of secure, large scale and reliable generation has played a major role both in meeting our growing electricity demands and in protecting our energy security – reducing dependence on imported energy and insulating the UK from fuel supply interruptions overseas. They have also made a major contribution to reducing our carbon emissions.

However in generating electricity nuclear stations also produce relatively small quantities of radioactive waste, including some higher-activity wastes that will ultimately need to be disposed of in a geological disposal facility (GDF). Pending the availability of a GDF these wastes, and those from any new stations, can continue to be stored in safe and secure interim storage facilities either at the stations themselves or at Sellafield.

Whilst interim storage is potentially a long term option, we believe public confidence in the MRWS process would be enhanced by continuing progress on the GDF issue. We therefore welcome the Government's call for evidence.

We agree with Government that geological disposal is the appropriate policy for the long term safe and secure management of higher activity waste in the UK. The Government's independent advisers CoRWM were clear that it was the right mechanism and it is the solution being adopted internationally.

Good progress is being made overseas. Repository sites have already been identified, with local support, in Sweden (Oskarshamn and Osthrammar) and Finland (Olkiluoto). Construction is well underway on the latter. In France plans for the Cigeo facility have reached the stage of final public consultation.

Experience in those countries that have made good progress with their repositories demonstrates that the right process and effective community engagement can lead to broader public acceptance. We therefore agree that volunteerism is the preferred approach.

Against this background we agree that the current site selection process should be reviewed in the light of overseas experience to see if improvements can be made.

What aspects of the site selection process in the MRWS White Paper do you think could be improved and how?

Communities will only participate in the site selection process if they have confidence that they will be effectively engaged and involved in the process. Any concerns about the key issues - including the potential risks and benefits - must be properly considered and resolved.

The engagement vehicles set out in the MRWS White Paper - including the setting up of the West Cumbria Managing Radioactive Waste Safely Partnership (WCMRWSP) - were sensible. However we believe that public understanding of the key issues would be greatly improved if a specific advocate was identified to make the wider ranging case for the repository.

In the case of Cumbria such an advocate would have been able to take the lead in responding to the very public criticism that was made of the GDF proposals on safety and geological grounds following publication of the WCMRWSP report. In this context independent and well regarded expert bodies - such as the British Geological Survey, Health Protection Agency, Office for Nuclear Regulation and the Environment Agency - could also make an important contribution in putting potentially alarmist claims into perspective. CoRWM, as a group of independent experts appointed by Government, could also have an important role.

We believe that the NDA, as the repository developer, should undertake the GDF advocacy role and should be under an obligation to communicate not just with the community, stakeholders and the public, but also the local and national media.

What do you think could be done to attract communities into the MRWS site selection process?

We agree that there should continue to be an open process for volunteer communities.

However we believe that new communities are more likely to be attracted to the MRWS process if they are approached by a GDF advocate - as set out above - with a clear narrative explaining the case for participation.

Again we believe the NDA are in the best position to undertake the advocate role, and recommend that they embark on a drive to identify new communities as soon as possible. There should be a proactive communications programme, and they should look at novel and creative means of explaining the facts. Overseas experience from places such as Sweden may prove useful in developing a comprehensive and innovative communication strategy.

We would suggest that they should start the dialogue with existing nuclear communities, who will already have a clearer understanding of the nuclear issue and the associated benefits.

What information do you think would help communities engage with the MRWS site selection process?

Before deciding to participate communities need to appreciate the terms and conditions of the MRWS process, particularly their right to withdraw. They also need to feel they have a good grip of the potential risks associated with the construction and operation of a GDF, including the criteria and tests used to assess geological suitability; safety; and roles and accountabilities, as well as the potential benefits for the local community of hosting a GDF.

In relation to the latter it would be helpful if NDA could provide a much clearer picture of the potential socio-economic benefits associated with the construction of such a large scale national infrastructure project. Government should also provide as much detail as possible at this stage on the community benefits package available to a potential host community, making clear that at least some of this would be available from the moment a Community decided to become involved in the process. We believe that spelling out these positive aspects of the case would greatly assist informed decision making.

NIA 10/06/13