



Department
of Energy &
Climate Change

Call for Evidence

Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility

Response form

13 May 2013

Call for Evidence

Please use this form to answer questions on the Call for Evidence on Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility.

The closing date for the submission of responses is **10 June 2013**.

Responses can be returned by email (preferable) or post.

Email address: radioactivewaste@decc.gsi.gov.uk

Or by post to: The Managing Radioactive Waste Safely team
Department of Energy and Climate Change
55 Whitehall
London
SW1A 2EY

In order to help us analyse responses, please provide details of your organisation.

When the call for evidence ends, we may publish or make public the evidence submitted. Also, members of the public may ask for a copy of responses under freedom of information legislation.

If you do not want your response - including your name, contact details and any other personal information – to be publicly available, please say so clearly in writing when you send your response to the call for evidence. Please note, if your computer automatically includes a confidentiality disclaimer, that will not count as a confidentiality request.

Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential.

The responses to this Call for Evidence will inform a public consultation that will follow in the autumn.

We would like to keep stakeholders who are interested in the MRWS process up to date on developments. If you would like to be kept up to date please sign up at the end of the form.

Introduction

1. The UK Government's policy for the long-term management of higher-activity radioactive waste is geological disposal¹. In 2008 the Managing Radioactive Waste Safely (MRWS) White Paper² was published which outlined a framework for implementing geological disposal based on the principles of voluntarism and partnership.
2. Three local authorities formally expressed an interest in the MRWS programme: Copeland and Allerdale Borough Councils, and Cumbria County Council. In January 2013, the three local authorities voted on whether to proceed to stage 4 of the process. The two boroughs voted in favour, but the county voted against. The Government had in 2011 given a specific undertaking that the existing site-selection process would only continue in west Cumbria if there was agreement at both borough and county level. The county's decision therefore ended the existing site selection process in west Cumbria.
3. Shepway District Council in Kent had also taken soundings from local residents, but subsequently decided against making a formal expression of interest in the current MRWS process.
4. The Government remains firmly committed to geological disposal as the right policy for the long-term safe and secure management of higher-activity radioactive waste. The Government also continues to hold the view that the best means of selecting a site for a geological disposal facility (GDF) is an approach based on voluntarism and partnership.
5. Evidence from abroad shows that this approach can work, with similar waste disposal programmes based on these key principles making good progress in countries like Canada, Finland, France and Sweden.
6. The fact that two local authorities in west Cumbria voted in favour of continuing the search for a potential site for a GDF demonstrates that communities recognise the substantial benefits that are associated with hosting such a facility – both in terms of job creation and the wider benefits associated with its development.

Purpose of the call for evidence

7. In line with the Secretary of State's written Ministerial statement of 31 January 2013³, Government has been considering what lessons can be learned from the experiences of the MRWS programme in west Cumbria and elsewhere. We are now inviting views on the

¹ Radioactive waste disposal is a devolved matter. The Scottish Government has a separate policy and supports long-term interim storage and an on-going programme of research and development. The Welsh Government has reserved its position on geological disposal of radioactive waste while continuing to play an active part in the MRWS process. The Department of the Environment in Northern Ireland supports the MRWS programme.

² Managing Radioactive Waste Safely: A Framework for Implementing Geological Disposal
<https://www.gov.uk/government/publications/managing-radioactive-waste-safely-a-framework-for-implementing-geological-disposal>

³ See <https://www.gov.uk/government/speeches/written-ministerial-statement-by-edward-davey-on-the-management-of-radioactive-waste>

site selection aspects of the ongoing MRWS programme in this call for evidence, particularly from those who have been engaged in (or have been interested observers of) the MRWS process to date. The responses to this call for evidence will inform a consultation that will follow later in the year.

Background

8. Higher-activity radioactive wastes are produced as a result of the generation of electricity in nuclear power stations, from the associated production and processing of the nuclear fuel, from the use of radioactive materials in industry, medicine and research, and from military nuclear programmes.
9. As one of the pioneers of nuclear technology, the UK has accumulated a substantial legacy of higher activity radioactive materials. Some of it has already been processed and placed in safe and secure interim storage on nuclear sites. However, most will only become waste over the next century or so as existing facilities reach the end of their lifetime and are decommissioned and cleaned up safely and securely.
10. These higher-activity wastes can remain radioactive, and thus potentially harmful, for hundreds of thousands of years. Modern, safe and secure interim storage can contain all this material – but this method of storage requires on-going human intervention to monitor the material and to ensure that it does not pose any risk to human or environmental health. While the Government believes that safe and secure interim storage is an effective method of managing waste in the short to medium term, the Government is committed to delivering a permanent disposal solution.
11. In October 2006, following recommendations made by the independent Committee on Radioactive Waste Management, the Government announced its policy of geological disposal, preceded by safe and secure interim storage. The Government subsequently announced that it would pursue a policy of geological disposal with site selection on voluntarism and partnership. This remains Government policy.

Geological disposal

12. Geological disposal involves isolating radioactive waste in an engineered facility deep inside a suitable rock formation to ensure that no harmful quantities of radioactivity ever reach the surface environment. It is a multi-barrier approach, based on placing packaged wastes in engineered tunnels at a depth of between 200 and 1000m underground, protected from disruption by man-made or natural events.
13. Geological disposal is internationally recognised as the preferred approach for the long-term management of higher-activity radioactive waste. It provides a long-term, safe solution to radioactive waste management that does not depend on on-going human intervention.

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Or by post to: The Managing Radioactive Waste Safely team
Department of Energy and Climate Change
Room M07
55 Whitehall
London
SW1A 2EY

Name	REDACTEDREDACTEDREDACTED
Organisation / Company	Moresby Parish Council
Organisation Size (no. of employees)	
Organisation Type	
Job Title	REDACTEDREDACTED
Department	
Address	
Email	REDACTEDREDACTEDREDACTEDRE
Telephone	
Fax	

Would you like to be kept informed of developments with the MRWS programme?	Yes
Would you like your response to be kept confidential? If yes please give a reason	No

The Government is interested in your views on the geological disposal facility site selection process outlined in the 2008 Managing Radioactive Waste Safely (MRWS) White Paper. To assist us you may wish to consider the following issues in your response:

- What aspects of the site selection process in the MRWS White Paper do you think could be improved and how?
- What do you think could be done to attract communities into the MRWS site selection process?
- What information do you think would help communities engage with the MRWS site selection process?

The selection process would be improved by putting geology first rather than volunteerism. Government were told by Corwm that it was logical to first see what areas might be suitable (or at least at a preliminary stage not unsuitable) before a call for volunteer local authorities was made and then only to those L A's which at least showed some promise. The government of the day did not take that advice but any future call for volunteers must be after BGS has screened the country and probably in greater detail than was the case in West Cumbria

The geology was a key discussion point for many stakeholders. There was much confusion generated by the term "rock" which many took to mean something like granite. The discussions would have been greatly assisted by a clear draft statement of the geological requirements of the repository. These should be in terms which are independent of the rock type and are clear and unambiguous such as the volume of the formation, the permeability, distances to other features (water courses, valuable minerals....). Such a specification would ensure that when a site is under discussion, the suitability could be clearly demonstrated by reference to the specification. This has clear benefits in removing the suggestion that a site has been selected and then the geological conditions of the site then declared suitable because it is convenient and no other site has volunteered.

The expression of interest must show that there is at least reasonable public support. That was the case in West Cumbria but only because Cumbria county council did consult widely. If West Cumbria had entered the process only through expressions by the district council then local public support could not have been shown. Copeland B C did not consult at all but simply relied on a council policy which had not been disseminated in any meaningful way. Allerdale B C relied on two invitation only seminars. Central government must take some blame here because neither district council's expression followed the policy in the White paper (paragraph 6.18) and could well have been rejected. In the event the county council expression covered this failure.

There was a determined effort by the local authorities to keep economic development issues- in the case of West Cumbria Britain's Energy Coast- quite separate and to the extent that any attempt by that organisation to join the partnership was clearly going to

be rebuffed. This was a mistake and the community benefits that were to be part of the package should have been seen as one part of a massive economic development plan which should have then been shaped and discussed with the public using actual examples as to what the funds could bring. Instead there was always a backing away from both other aspects of economic development and any talk of amounts. By isolating the community benefits in this way then talk of a bribe gained ground.

There is little doubt that the over dominance by the principal authorities in the stage 3 partnership did little to foster trust that they were acting in the best interests of the community. It was quite apparent that public saw the partnership as leaning one way when in fact it did everything it could to show neutrality. It was only some way through the work that the penny began to drop with the senior councillors involved that to be both part authors of a report and then decision makers looked odd to the outside world. For some the penny never did drop.

It was a mistake in West Cumbria to ignore sections 7.23 to 7.27 of the whitepaper until a last ditch effort was made in the county council cabinet to save the process from what the proposer thought was a premature end. It could have been made clear either when the expression of interest was made or at any time thereafter that certain areas were to be ruled out and a decision to participate would not be made in respect of that or those areas. In the case of West Cumbria no one should have been left in any doubt well before the final report was written that the Lake District both above and below ground was a no go area.

Finally, trust was always an important issue. One of the principles of the process was the right of withdrawal. However, the absence of alternative volunteers and the current location of the high level waste meant that there was a perception that there was an inevitability of the outcome. If there was an attempt to withdraw at a later stage, it would be too late and the repository would be imposed regardless. In this light, it was widely suggested during the consultation discussions that it would be advantageous to enshrine the right of withdrawal in legislation, and there was a strong consensus that this would be beneficial. The refusal to take up this suggestion seriously undermined the trust in the process.

In short it has to be:

- a) geology before volunteerism**
- b) a clear geological specification**
- c) much closer adherence to 6.18 both by the local authority and central government**
- d) better understanding by the residents of the area that a GDF is but part of a huge economic development scheme with extensive benefits**
- e) clear independent leadership of any group however formed that undertakes the work in moving to a decision to participate**
- f) acceptance that even when an expression of interest is made for a certain area it does not follow that a decision to participate need be made for the whole of that area.**
- g) enshrine the right of withdrawal in legislation**

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