



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](mailto: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 disposal<sup>1</sup>. In 2008 the Managing Radioactive Waste Safely (MRWS) White Paper<sup>2</sup> 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 2013<sup>3</sup>, 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

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<sup>1</sup> 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.

<sup>2</sup> 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>

<sup>3</sup> 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.

# Response form

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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	National Nuclear Laboratory
Organisation Size (no. of employees)	REDACTEDREDACTEDREDACTED
Organisation Type	REDACTED
Job Title	REDACTEDREDACTEDREDACTEDRE
Department	
Address	REDACTEDREDACTEDREDACTEDRE DACTEDREDACTEDREDACTEDREDA CTEDREDACTEDREDACTEDREDACT EDREDACTEDREDACTEDREDACTED
Email	REDACTEDREDACTEDREDACTEDRED
Telephone	REDACTEDREDACTED
Fax	REDACTEDREDACTED

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

Voluntarism and partnership are the cornerstones of the current MRWS process and should continue to be cornerstones of any revised process.

If the MRWS process is to be developed further the key aims should be to facilitate the engagement of the widest possible range of communities and to provide communities with the information they require to make an informed decision as to whether or not to register an Expression of Interest.

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

Within the current MRWS process the first stage at which a community can formally engage with the site selection process is to register an Expression of Interest. This is, or is perceived to be, a high hurdle to entry to engagement in the site selection process. The process might be improved by reducing this initial barrier to engagement by introducing a staged engagement process prior to registering an Expression of Interest. The earliest stage of engagement could be as simple as providing access to basic information that can be downloaded. Subsequently, and for as long as a community wishes to continue to receive information prior to registering an Expression of Interest, this might involve progressively greater engagement resulting in access to increasing quantities of objective and impartial information. This early engagement could involve public meetings, face to face discussions and briefings containing a range of level of detail relevant to the needs of the community at any given time. It would be important to provide all such information at no cost to the community to ensure that even minor expenditure does not become a barrier to engagement.

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

Registering an Expression of Interest does not represent a commitment on behalf of a community. The next stage in the MRWS process is for a community to make a "Decision to Participate" in a siting process, although this also does not represent a commitment to host a facility. A community will require access to a greater body of information or evidence to make a Decision to Participate. At the moment the MRWS White Paper says that Government will

provide an Engagement Package to communities that have made a Decision to Participate which “... *either partly or wholly*...” meets the cost of setting up or operating a Community Siting Partnership. Thus communities must assume that that they will have to bear the whole cost of engagement prior to making a Decision to Participate and may well be required to bear at least some of the costs of engagement after a Decision to Participate has been made. From the perspective of a community the uncertainty in their cost of engaging in the process could very well be a disincentive to engage at all. This barrier would be largely removed if it was made clear that all reasonable costs of engagement would be met.

We agree that the Right of Withdrawal is an important component of the voluntarism approach. Under the current MRWS process communities have the right to withdraw from the process at any stage up to the point at which underground operations and construction are due to begin. However the process for withdrawal is not clear. Communities may be more willing to engage in the siting process if they have confidence that there is a legally robust guarantee of the ability to withdraw from the MRWS process.

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

Information requirements are likely to increase progressively as a community progresses through the MRWS process. Up to and following registration of an Expression of Interest it is likely that a community will require progressively more information. There is a wide range of information that may be required:

Information on the implications of hosting a facility – this might include a range of facts and figures which give an impression of the potential impact on the community. This might include (but would not be limited to) information on how large a facility would be, how many jobs would be created at various stages of the facility life cycle, the environmental impact of the facility (e.g. how many lorries or trains would be passing in and out of the facility at various stages of the life cycle).

A more detailed description of the process – this might include information on the steps and likely timescales in the whole process spanning site selection, licensing, construction and operation. It might also include more information on the robustness of the process underpinning the right to withdraw.

The cost of engagement - what, if any, financial support the community can rely on to support its engagement with the process.

The benefits package - the current process identifies the potential for a benefits package, but provides no information on the potential scale or scope of such a package. Providing more information on the benefits package may also encourage potential host communities to engage in the siting process. The information might include clarification of :

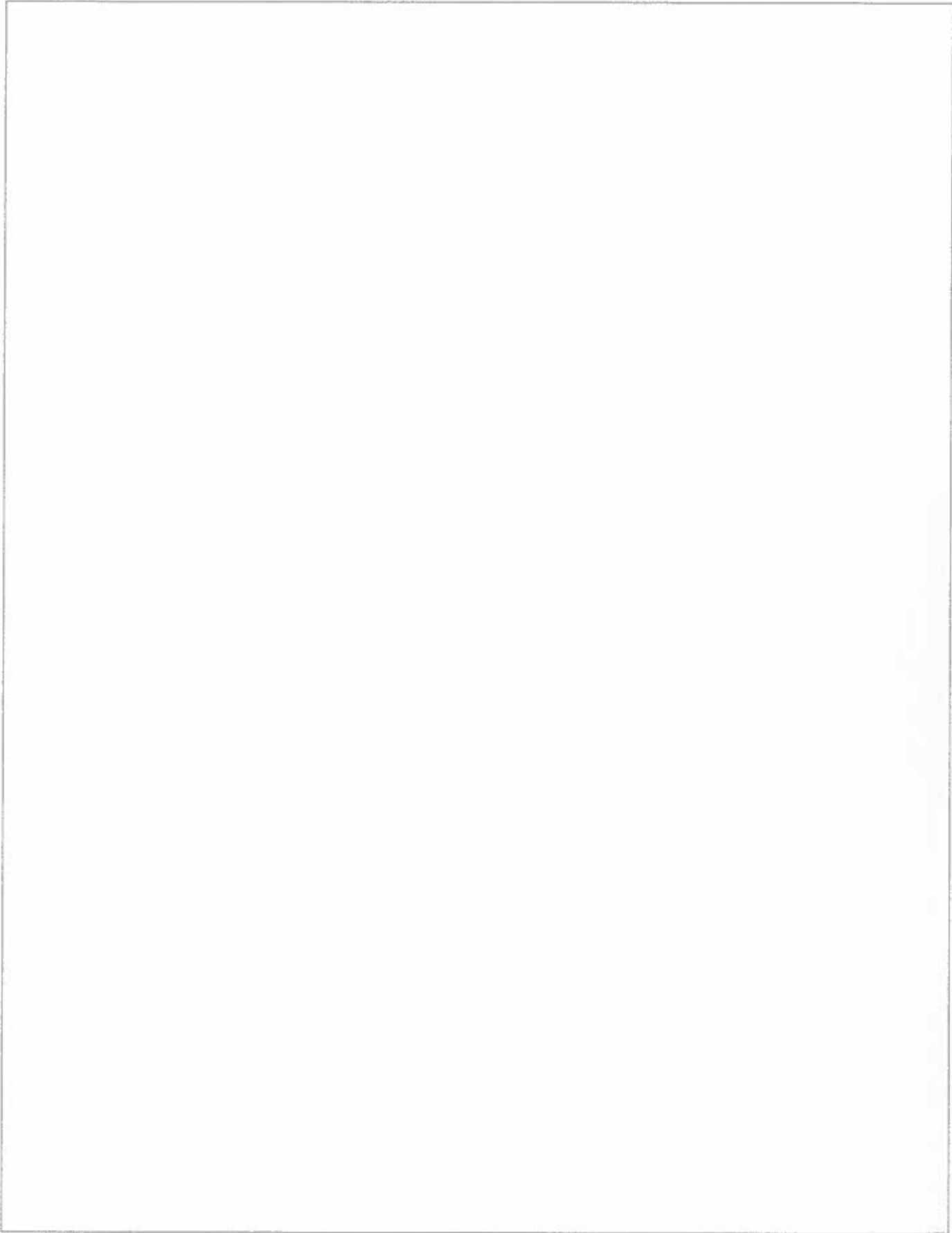
- the requirements for eligibility,
- the possible scope and magnitude of a benefits package,

- the timing in relation to release of funds,
- the legal robustness and
- who would control aspects of the benefits package

The experience of host communities or potential host communities in other countries – it may help communities to understand the experience of communities in other countries who have engaged with site selection processes. This might include understanding why communities such as Olkiluoto chose to compete to be selected as a host community and what information or experience was critical to their decision. It might also include understanding why other communities chose not to engage.

The scientific basis for geological disposal – any community which enters the engagement process is likely to require access to progressively more information as they progress through the MRWS process. This information may be generic in the early stages but is likely to become more site-specific as more detailed engagement progresses. It is important that communities have access to all points of view and that information is robust.





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Department of Energy & Climate Change  
3 Whitehall Place  
London SW1A 2AW  
[www.gov.uk/decc](http://www.gov.uk/decc)

URN 13D/105