

MRWS consultation from the British Geological Survey

Submissions close 19th December 2013

via www at:

<https://econsultation.decc.gov.uk/decc-policy/managing-radioactive-waste-safely-siting-process>

Consultation document at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/239237/Consultation_Review_of_the_siting_process_for_a_GDF_FINAL.pdf

Consultation Questions

Q1. Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place? If you do not agree with the need for such a test, please explain why.

Yes. However, the type of 'test' of public support, the constituency for the test and pass/fail criteria will need to be agreed well in advance, perhaps at the outset of formal participation. The timing of such a test is also important. We believe that at least some borehole drilling as well as non-intrusive site investigation/assessment surveys need to be completed and interpreted to allow an informed decision to be made. Quite where between drilling of first borehole and start of underground construction/investigations a suitable point lies needs to be considered. This may be the point at which initial works has confirmed the likely suitability of a site but before final phase of site borehole drilling.

Q2. Do you agree with the proposed amendments to decision making within the MRWS siting process? If not, how would you modify the proposed phased approach, or, alternatively, what different approach would you propose? Please explain your reasoning.

Yes this is a sensible approach, however 1-2 years 'learning phase' may be too short, especially in areas where new data need to be interpreted and assimilated, for the delivery of all reports and for the 'representative authority' digest them and to seek any clarifications that may be required by them. Some flexibility to extend the duration of this phase may be appropriate.

'Reasonable prospects' of suitability of an area needs clearer explanation.

An indication of the order of magnitude of the benefits package may be helpful. It would be useful to be more specific on the proportion of benefit that will be accessible prior to the close of the right to withdraw period and what, if any, constraints may be applicable. Direct funding to support participation activities of the 'representative authority' prior to formal participation is important to ensure that they are not out of pocket as a result of engaging in the process.

There are a lot of technical issues relating to the geological aspects of radioactive waste disposal and provision of a service to provide technical advice to non-geologists in the 'representative authority'

may be helpful. This could be included in the provision for the geological assessments during the learning phase but may need to be available prior to this as well as after.

Q3. Do you agree with this approach to revising roles in the siting process set out in the White Paper? If not, what alternative approach would you propose and why?

Yes.

Q4. Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process? If not, what alternative approach would you propose and why?

Broadly yes. Information on suitable geological environments (based on the 9 published by the EA) needs to be available in a non-technical form.

Section 3.9 as written is unclear and it should be clarified that this section is referring to screening at a national or regional level and not at the 'representative authority' level.

Section 3.18 is very technical and is probably not helpful at this stage.

Peer review is noted in 3.20 and will be an important aspect of much of the technical aspects of the siting process and later GDF development. Ensuring that this is done impartially by suitably qualified and experienced reviewers is a critical part of the process and one that will need to be done transparently and appropriately.

Q5. Do you agree with this proposed approach to planning for a GDF? If not, what alternative approach would you propose and why?

Yes NISP is appropriate for the GDF application. We believe that the NSIP should be applicable at the stage where a preferred site for a GDF is identified through a combination of non-intrusive surveys and boreholes (up to 10 years) and for which underground access is now sought. We do not believe that the NISP is appropriate for approvals for non-intrusive surveys and boreholes, should planning consent be required. They should go through normal planning and approval routes because any subsequent application may not be made for a site being evaluated and cannot be made until after such an evaluation has been completed.

Q6. Do you agree with this clarification of the inventory for geological disposal – and how this will be communicated with the volunteer host community? If not, what alternative approach would you propose and why?

No comment.

Q7. Do you endorse the proposed approach on community benefits associated with a GDF? If not, what alternative approach would you propose and why?

Yes. Clarifying the proportions of the benefits package that will be accessible early in the process is needed. It is important that there are no costs to the 'representative authority' resulting from participating in the process.

Q8. Do you agree with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF? If not, what alternative approach would you propose and why?

Yes.

Q9. Do you have any other comments?

The consultation as written seems largely to be based on the assumption that a GDF will be constructed in any area that is put forward by a 'representative authority'. This may not necessarily be the case and perhaps some thought should be given to ensure that this is reflected in future documentation that arises from the consultation.

There is a lot of technical language and jargon in the consultation and only some of this is included in the glossary. Clarification and use of plain(er) English would be helpful.

Some of the illustrations are very technical, in particular figures 2, 3 and 5, and they will not be fully understood by the majority of readers.

Figures 1 and 4 show delivery of the geological and socioeconomic reports by the NDA at the end of the learning phase. To be helpful for the 'representative authority' making a decision on whether to proceed or not these documents need to be made available to them well before the end of this phase.