



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.

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?

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

The site selection process, as outlined in the MRWS White Paper, was predicated upon the principle of engaging communities through a volunteerism and partnership approach. The White Paper stated the approach is "one in which communities voluntarily express an interest in taking part in the process that will ultimately provide a site for a geological disposal facility."

The proposed site selection process also included a number of potential early steps as outlined at 6.13 of the White Paper. Allerdale Borough Council broadly followed these initial suggested steps following its publication in June 2008. This led to the authority agreeing to "without commitment discussions with Government on the possibility of hosting a geological disposal facility at some point in the future." (Stage 1 of the site assessment process - Chapter 7).

Following the expression of interest Allerdale and Copeland formed the West Cumbria MRWS Partnership. Allerdale very much welcomed the White Paper's position that a volunteerism and partnership approach is not too prescriptive. The members of the West Cumbria MRWS Partnership developed and agreed the terms of reference, membership and work programme of the Partnership. The members of Partnership, in setting their work programme, were able to plan and receive presentations and papers from industry experts, some of which were supportive of the MRWS process, others were opposed. One such presentation from the NDA outlined how a volunteerism approach was being adopted in other Countries who were in a more advanced stage of geological disposal of higher activity radioactive wastes.

One of the early pieces of work carried out by the partnership was the fulfilment of indicative Step 7 in the White Paper, "undertake high-level geological screening". (Stage 2 Chapter 7). This piece of work was commissioned by government and was a very specific higher level geological screening, essentially ruling out areas that included natural resources at depth, that might one day be needed to be exploited. Exploitation of the resources would be compromised if a geological disposal facility were to be located where they were found. This step therefore immediately brought the issue of geology into focus, and in West Cumbria an assurance was given by government that sufficient areas remained for the process to continue in West Cumbria.

This commitment from government engaged a number of groups and individuals who claimed

that the government were inappropriately supporting the search for a geological disposal facility in West Cumbria, because, in their opinion, the geology was not suitable. The government had stipulated in Chapter 7 of the white paper - the site assessment process, that detailed geological desk top studies would be carried out in an area deciding to participate in the MRWS process (Stage 3 Chapter 7). This decision comes at the end of potential early steps in the white paper, No indicative timescales were given by government as to how long each stage would last. The eventual decision to participate was made 4 years after the first expressions of interest submitted by the 2 district councils. This long period of time gave the opportunity for members of the partnership to explore in significant detail, the issues of geological disposal, and also gave the opportunity for significant public engagement, consultation and the gauging of public opinion to be undertaken.

The significant timescale also meant that the issue of the suitability of the geology of the area remained an uncertainty which would only be resolved if a decision to participate was to be taken. Following 4 years of work and significant investment from the government, the eventual decision to participate became a major decision of national interest for each decision making body and although government confirmed its commitment to volunteerism and the "right of withdrawal", a degree of scepticism remained around the right of withdrawal. This was crystallised by a strong will for the right of withdrawal to be put on a legal footing either before or after a decision to participate.

Arguably this uncertainty could have been met earlier, if the detailed geological desk-top survey work had been carried out in stage 3 of the MRWS process, as a part of the geological screening to rule out areas with potentially exploitable natural resources.

Furthermore the lack of certainty about what is meant by "community", both in terms of "volunteering" and in terms of "benefits", when there are several definitions in the White Paper, ultimately became a barrier to understanding and confidence in the process. That too could have been mitigated by undertaking the desk-top geological studies in Stage 3 rather than Stage 4, as the directly affected populations would have been more readily identifiable, rather than being the subject of speculation.

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

The long term disposal of higher activity radioactive waste is always likely to be contentious. The government seem to have correctly judged that areas most likely to come-forward and express an interest in a volunteerism process as outlined in the White Paper, are those communities that either have an understanding of the nuclear industry or experience of already having stocks of radioactive waste stored in the local area or preferably both. The right of withdrawal has been expressed as important to communities that engage with the government on this issue and put the right of withdrawal on a legal footing could assist to attract areas to consider, as could making clear the likely nature and extent of community benefits an area might receive in hosting a deep geological disposal facility.

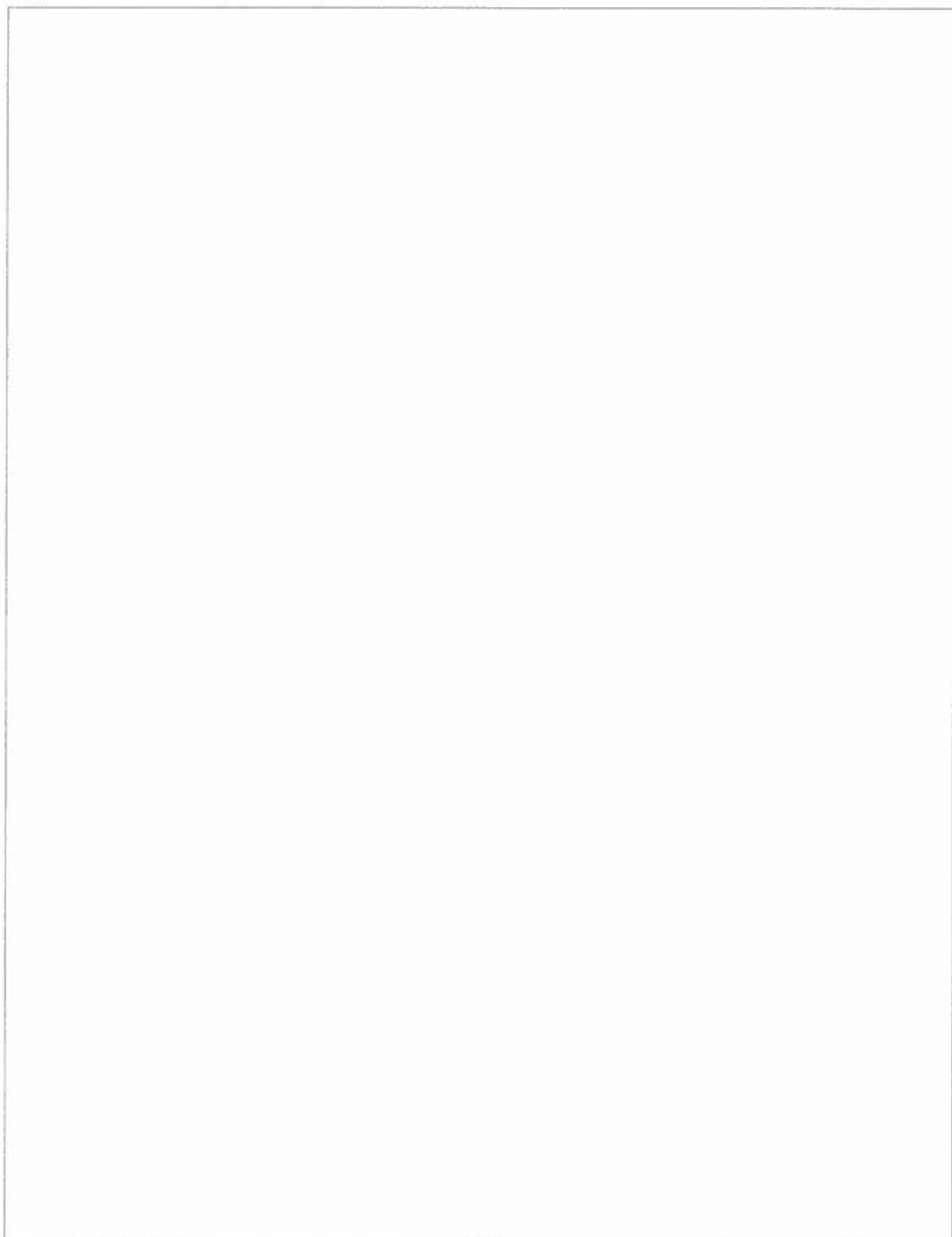
- What information do you think would help communities engage with the MRWS site selection process?

The West Cumbria MRWS Partnership's final report was the accumulation of a 4 year work programme. The issues covered included:

- Geology
- Inventory
- Design and Engineering
- Safety, Security, environment and planning
- Impacts
- Community benefits package
- Overarching issues

Whilst some of this work was specific to West Cumbria much of it is generic in nature and the research, findings and opinions should be of use to other communities that are considering engaging in the MRWS site selection process.

Finally one of the political groups in Allerdale has indicated that their group wish to go on record as not supporting a reopening of the process in Allerdale.



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