



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?

Communities against Nuclear Expansion is expressing the views because of our understanding of what is and has happened at Sizewell, and what may happen.

We are aware of the problems because of research we have undertaken and are gravely concerned that after 50 years of producing radio active waste we are still seeking answers.

My group feel very strongly that the problems of all wastes from Nuclear Power plants are so varied and complex that until we have a full comprehensive plan to deal with all the complexities we should not consider building further plant.

However

1) We believe there needs to be much more consideration given as to the short term and interim storage of all types of RA waste. Sizewell A spent fuel is being shipped to Sellafield, but we still have a great deal of ilw and llw, at present consideration is being given to its storage. The ilw may well end up staying at Sizewell A in yellow storage boxes. There is also the long term problem of the graphite core of Sizewell A which will not be dealt with for many years but will then need a resting place. Maybe this too will stay at Sizewell.

2) At present EdFE Sizewell B are to build a Dry Fuel Store. The local community were not told this when Sizewell B was built. So we have had this facility imposed on us. There is no where else for the hlw to go. As from 2015 the pond at Sizewell B will be full. The choice/consultation was to either shut down the plant or find an alternative to the pond.

There is no compensation to the local people of Leiston for the DFS of hlw, only £200,000 to the AONB management + £20,000 per year. Leiston is the nearest town and outside the AONB and will receive no benefit from having hlw on our coast for up to 100years. Compensation should not be a bribe to console people but a realisation by Central Government of exactly what they are asking of Communities.

We recognise the hlw has to be stored, monitored and managed, but local people should be properly compensated and even more importantly told the absolute truth about the issues. They certainly should NOT have it forced upon them.

3) Our understanding is that the casks and materials to be used for the storage of h/w have NOT been tried and tested. We understand from our experience of Sizewell B that the spent fuel will be sealed into containers and then into concrete silos. (We also understand that there is still controversy around the materials to be used)

The silos are then to be stored in the DFS where they will be monitored and managed and there they will stay until a GDF is ready to accept them. If there is a problem with the packaging they will have to be re-packaged.

If these packages were to go into GDF How are they to be monitored and how are they to be transported? Particularly as the last time we asked we were told each silo would weigh around 120 tonnes.

If new stations are built the same issues will arise. Have the community around Hinkley C been asked their opinion of this situation?

It does the Nuclear industry no favours when people are not told all the truth or are told half truths.

If the scenario is that more DFS are to be built to contain h/w people must be told as part of the planning process for new build. This may also be the case for storage of spent fuel from AGR stations.

4) We are very concerned about the wording Geological Disposal Facility . Is the h/w to be disposed or would it have the ability to be retrieved? This needs very careful consideration.

Disposal means just that, would a better word be Repository, which seems to be what other Governments are considering.

People are very concerned that we think we can dispose of radio active waste into a facility under ground and consider it safe. We firmly believe that all radio active waste should be managed in a way which enables it to be observed, monitored, managed and guarded.

But this also goes for any under ground facility, it must be proven to be 100% safe, so as to prevent any leakage into the surrounding geology, including water courses. Any previous ground working such as coal mining and future such as fracking may render any underground storage as inoperable.

Therefore the geology must come first, and it should be in the least obtrusive place, not in a National Park or in an AONB. Until as such time that it can be proven that the casks and containment are 100% "safe" Any *disposal* should not be attempted. When it is considered that the casks are "safe" maybe underground storage could be considered.

We are not convinced at present that any geological storage is feasible, or the safest option.

As the government presses ahead with seeking facilities for either above ground, or below. We believe communities should have all the facts laid out before them with NO half truths. Neither should they be bribed into accepting something which is abhorrent to them.

Conclusion

We would like to see a clear *fully laid out plan* for how the all the various types of waste which we have created over the past 50 years, are to be managed, which are acceptable to the majority.

To achieve the best outcome there needs to be a well trusted competent person to pull all the strands together to come up with a long term plan. This will only come about if Communities, NGOs, and political parties etc all work together.

The lead person should not be someone from the nuclear industry, nor with a political mantle.

Whilst cost is something which obviously needs to be considered, the overall costs must not fall on the tax payer but also on the Industry. Whilst cost obviously is a major issue the sustainability and environmental considerations must carry equal weight.

We apologise for not answering the questions you asked but we have given you the considered view of a locally based group, which we hope is helpful.

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Department of Energy & Climate Change
3 Whitehall Place
London SW1A 2AW
www.gov.uk/decc

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