



Department
of Energy &
Climate Change

Call for Evidence

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

Response form

13May 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

¹Radioactive 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>

siteselection aspects of the ongoingMRWS 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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Department of Energy and Climate Change
Room M07
55 Whitehall
London
SW1A 2EY

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|--------------------------------------|---|
| Name | REDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTED |
| Organisation / Company | Joint response on behalf of: Black Country Local Enterprise Partnership (LEP) Dudley MBC Sandwell MBC Walsall Council Wolverhampton City Council |
| Organisation Size (no. of employees) | |
| Organisation Type | REDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTED |
| Job Title | REDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTED |
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| 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 siteselection 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 siteselection 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 siteselection process?
- What information do you think would help communities engage with the MRWS site selection process?

Site Selection Process

We suggest it would be better to filter out areas that are obviously unsuitable for geological or other reasons, before inviting expressions of interest to avoid any further abortive proposals.

Stage 1 should therefore comprise a high-level evaluation of conditions in each area, using published geological information, and other data on population, environmental, socio-economic and transport infrastructure available from national sources. The suitability of each area should then be assessed using the “sub-surface screening criteria” in Annex B of the White Paper, and the other National Criteria identified in the 2012 Framework. The results of this assessment should then be published (Stage 2).

Stage 3 should involve inviting expressions of interest from local authorities and Local Enterprise Partnership in areas that the assessment shows are likely to have suitable geological and other conditions to provide Potential Candidate Sites. Any areas put forward would then be subject to further assessment, using Local Criteria, SEA, HRA (where required), and possibly also site investigations, as set out in Stages 4 – 5, before Candidate Sites are chosen, appropriate permissions are obtained, and facilities implemented (Stage 6).

Site Selection Criteria

National Criteria

Annex B of the White Paper (2008) identifies “initial sub-surface screening criteria” covering natural resources, groundwater, geological stability and geotechnical issues. The 2012 Framework identifies further national criteria for identifying Potential Candidate Sites:

- Geological setting (which we assume refers to criteria in White Paper)
- Potential impact on people
- Potential impact on the natural environment and landscape
- Potential effect on local socio-economic conditions
- Transport and infrastructure provision
- Cost, timing and ease of implementation

We would support the use of these criteria in the initial filtering process at Stage 1.

Local Criteria

The 2012 Framework also indicates that as well as the national criteria identified local criteria, derived from local planning policies, should be taken into account. We would suggest the following local criteria would be appropriate to use at Stage 4 of the process.

Geological Setting

Mineral resources – resources of local and national importance included within a mineral safeguarding area (MSA) in an adopted local plan.

Geotechnical risks – areas included within Coal Mining Development Referral Areas defined by the Coal Authority, identified in an adopted local plan, or in local technical studies as having other geotechnical problems

Groundwater – areas included within Principal Aquifer and/ or Groundwater Source Protection Zones (SPZs)

Potential Impact on People

Proximity to large centres of population

Potential Impact on the Natural Environment and Landscape

Natural Environment – potential for harmful impacts on European Sites, and habitats and species of national or local importance

Landscape - areas defined in adopted local plans as being nationally or locally important for landscape, areas of Grade 1 – Grade 3 agricultural land

Potential Effect on Local Socio-Economic Conditions

Economy - Enterprise Zones, other areas identified in adopted local plans as requiring economic regeneration

Social Deprivation – areas identified in local plan and/ or Indices of Multiple Deprivation (IMD) within the most deprived x in the country

Health – areas identified in local plan and/ or local Joint Strategic Needs Assessment (JSNA) as having significant health problems linked to environmental conditions

Transport and Infrastructure Provision

Areas with potential to transport waste by rail or sea rather than by road

Areas of the national/ local road network affected by significant traffic congestion

Cost, Timing and Ease of Implementation

Cost - extent of geotechnical constraints identified above likely to result in abnormal costs

Timing – extent of geotechnical constraints identified above likely to result in additional time required to make site suitable for use, extent of other constraints likely to require mitigation and enhancement to deal with potential environmental and other impacts

Ease of implementation – range and complexity of constraints that need to be overcome, extent of potential public opposition

Engaging with Communities

There are unlikely to be any easy ways of “selling” proposals for geological disposal of radioactive waste to local communities, particularly in areas where hazardous waste disposal or other waste management operations have already caused problems.

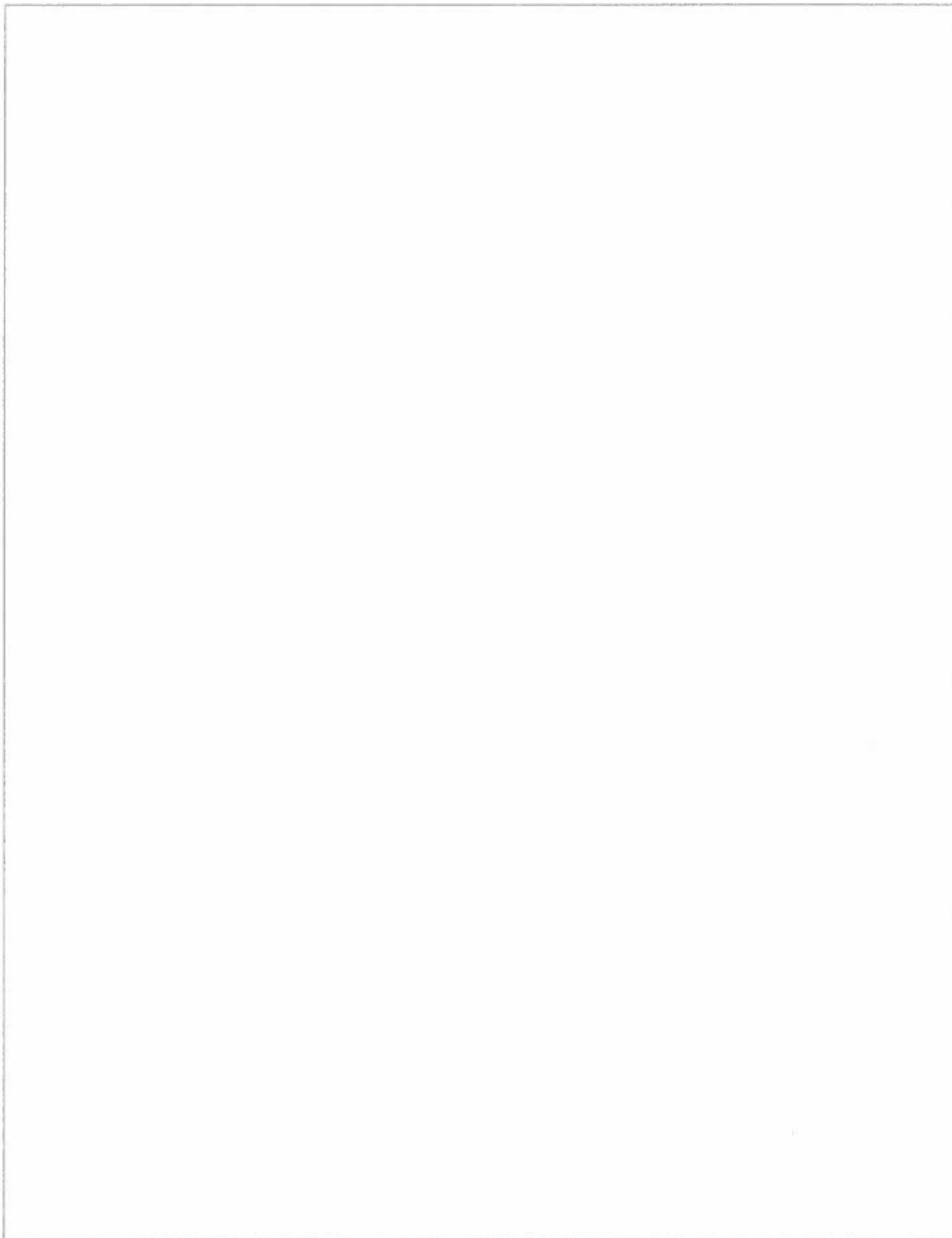
Experience in Walsall Borough suggests that communities affected by hazardous waste disposal in the past have long memories, and will – with good reason – be highly suspicious of any new waste disposal proposals, let alone proposals for geological disposal of radioactive waste. They will not trust it to be safe whatever reassurances are given, and will not want to engage in a positive way.

If the government wishes to continue down the “volunteerism and participation” route, it should avoid identifying Potential Candidate Sites in areas where hazardous waste disposal has caused problems in the past. In view of the past history of some sites in our area, we would suggest the Black Country is towards the bottom of the list of search areas to consider.

Information

No communities are likely to volunteer unless they can see that the risks are minimised as far as possible, and that they will get some positive, tangible benefits in return. It will therefore be important to clearly set out:

- What the risks are likely to be and how they will be managed, e.g. what contingencies are in place if anything goes wrong;
- How the community can expect to benefit from agreeing to accept the waste in their area, e.g. how will DECC ensure that the “highly skilled and well-paid jobs” on offer will actually be available for local people, rather than outsiders, particularly in areas of low educational attainment?



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URN 13D/105