

From: REDACTEDREDACTEDREDACTEDREDACTEDREDACTED

Sent: 14 June 2013 12:58

To: radioactivewaste (DECC)

Subject: MRWS - Call for Evidence

With apologies for late response. Below please find CORE's comments.

Thanks,

REDACTEDREDACTEDREDACTED

Name	REDACTEDREDACTED
Organisation / Company	CORE [Cumbrians Opposed to a Radioactive Environment]
Organisation Size (no. of employees)	REDACTEDREDACTED
Organisation Type	REDACTEDREDACTEDREDACTED
Job Title	REDACTEDREDACTED
Department	
Address	REDACTEDREDACTEDREDACTED REDACTEDREDACTEDREDACTED REDACTEDREDACTEDREDACTED REDACTEDREDACTEDREDACTED
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Would you like to be kept informed of developments with the MRWS programme?	Yes
Would you like your response to be kept confidential? If yes please give a reason	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?

With sincere apologies for late response which CORE makes on behalf of its UK and Overseas members and supporters.

That so few local authorities have been tempted to express an interest in participating in the MRWS process should send a clear message to Government that the prospect of hosting an international geological disposal facility is seen as a detriment (socially, economically and environmentally) that is to be avoided at all costs.

The 'No' vote by Cumbria County Council which, quite rightly, brought the West Cumbrian MRWS process to an end showed that a primary issue of contention was that what had been launched initially by Government as a means of solving the national problem of nuclear waste management had been turned into a local problem for West Cumbria alone – largely by courtesy of Copeland and Allerdale Borough Councils' well documented and long-standing subservience to the nuclear industry - the major problem voiced by respondents to the West Cumbria MRWS being that whilst a process involving volunteerism was acceptable, such volunteerism should be invited only when suitable geology had been first identified. In other words, the cart had been put before the horse.

A further major issue of contention was that despite a wealth of evidence showing the poor prospect of finding suitable geology in West Cumbria – and the earlier rejection by Public Inquiry into the NIREX plans for the Longlands Farm site at Gosforth – the West Cumbria MRWS process should have been run at all – let alone allowed to extend for a number of years before rejection.

The lesson to be learned by Government from the West Cumbrian experience is that, with any hope of securing belated interest on what has

become a largely discredited process from UK-wide local Authorities, sites with the best geological potential must first be identified – all areas of the UK being involved – and once identified, expressions of interest then – and only then - being canvassed from Authorities in those geologically selected areas. A failure to do this is likely to be a show-stopper for any form of future MRWS process.

Having said that, the Government will be aware that CORE has remained strongly opposed to the underground disposal of nuclear wastes – an opposition voiced against the original recommendations of CoRWM. Whilst the grounds for CORE's opposition are well documented via Public Consultation responses and the submission of evidence to CoRWM and to Public Inquiry, they are here a matter for discussion for another day. Suffice it to say that, in its repeated opposition to the deep disposal of nuclear wastes, CORE has championed the alternative waste management/disposal option of long-term above ground storage of wastes at the site of origin. As a permanent solution this has fewer technical restrictions, hazards and uncertainties than those currently posed to current and future generations by deep geological disposal.

The obvious and immediate advantages of this option are:

- It adheres to the internationally accepted principle that nuclear wastes should be disposed of at, or close to, the site of origin of the waste – ie, for most part, the already licensed nuclear sites
- The sites are therefore self-selecting and no volunteerism is required
- It transfers the responsibility for producing/managing nuclear wastes back to the nuclear industry itself – where it rightly belongs - and away from the general public who may or may not have any involvement or interest whatsoever in the nuclear industry
- The burden of hosting a waste disposal facility is shared by communities around those licensed sites who have already reaped the benefits (jobs, finance and local infrastructure) of the sites' nuclear operations
- It reduces to the barest minimum any future trans-UK transports of radioactive waste to a 'one-off' national disposal site.

The choice of disposal facility type (deep, shallow or above ground) will be a matter for the operator of the individual licensed site, its local community and the suitability of the local geology and the industry's regulators.

The Government will already have noted that as a result of the failure to date of its faulty MRWS process, CORE's option (for above ground storage) as outlined above is already in-force 'by default'. Given the view of CORE and others that the prospects of siting a deep disposal facility somewhere in the UK are, at best, light years away and, at worst, doomed to failure, the Government should now abandon any plans to continue its MRWS process (modified or not) for deep disposal in favour of concentrating its efforts and taxpayers money into the 'above-ground at site of origin option' which can be initiated on a permanent basis, without further delay and which may restore some semblance of public confidence that the Government will make the 'polluter pay' (in terms of restricting, minimising and managing its own wastes).

In respect if Intermediate Level Wastes (ILW) , which form the bulk of all materials currently destined for deep disposal, this option is already under discussion by the Nuclear Decommissioning Authority in relation to the storage of ILW at selected UK licensed sites via its May 2013 Credible Options Summary Paper on Optimising the number and location of interim Intermediate Level Waste (ILW) storage facilities on Magnox Limited and EDF Energy sites in England and Wales. This could be extended seamlessly to a permanent basis and to include spent fuel and High Level Wastes (in vitrified form) being similarly dealt with at their current locations.