



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

Response form

Please use this form to respond to this 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
Room M07
55 Whitehall
London
SW1A 2EY

Name	REDACTEDREDACTED
Organisation / Company	AMEC
Organisation Size (no. of employees)	REDACTEDREDACTED
Organisation Type	REDACTEDREDACTEDREDACTEDRED DACTEDREDACTEDREDACTEDREDA
Job Title	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?

AMEC believes that accelerated progress must be made in the UK to secure a GDF as part of an overall package of measures to enable the UK to meet its climate change commitment targets, with new nuclear power generation and full nuclear fuel lifecycle management being important constituent elements of this.

AMEC is a focused supplier of consultancy, engineering and project management services to its customers in the world's oil and gas, mining, clean energy, environment and infrastructure markets. With annual revenues of some £4.2 billion, AMEC designs, delivers and maintains strategic and complex assets and employs over 29,000 people in around 40 countries worldwide.

AMEC is the largest UK-based private sector supplier of programme, asset management and technical engineering services to the nuclear sector. The business has had a leading position in the UK nuclear market for over 50 years and UK clients include HSE, Environment Agency, Sellafield Sites, Magnox, EDF, AWE Aldermaston, BAe and Rolls Royce. Half of our nuclear business is now international with a wide client base covering nuclear utilities, vendors and regulators in the US, Canada, Europe, South Africa, Japan and Korea. AMEC is committed to maintaining its position as the leading UK engineering company servicing the growing UK and global nuclear market.

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

a) What aspects could be improved?

1. MRWS embraces the concept of community voluntarism and agreement – we believe this must be preserved to ensure future participating communities have confidence they are participating in an inclusive and transparent process.
2. We believe the MRWS process needs to be simpler and easier for communities to follow. Based on recent experience there needs to be a special emphasis on providing

clarity of the process to communities at the very earliest stages, to enable communities to complete MRWS Stage 1 (or a similar stage in which the wider community is involved).

3. Ideally, a significant number of communities (numbering several 10's) need to be sufficiently motivated to complete MRWS Stage 1. This would help to create a sense of 'competition' between the communities which in turn would benefit the process.
4. It is desirable for participation in Stage 1 to be time bounded for all potential GDF locations. This would allow all potential locations to be considered on their relative merits.
5. Several communities, from a range of geographical locations, need to participate in MRWS Stage 4. This would be helped if Government published a UK-wide map showing where the potentially suitable areas are - in other words, reverse Stages 1 and 2 so communities know from the start whether their location might be suitable or not.
6. There needs to be greater responsiveness and debate involving key stakeholders. The communities should have the opportunity to vote to help engagement and demonstrate the level of support. This should help encourage local supporters to come forward to promote the benefits and balance potential opposing views of local political leaders where these are driven by anti-nuclear politics.

b) How can the site selection process be improved?

1. Learning from existing successful processes.

The MRWS process should be better aligned with other successful processes, e.g. planning involving major projects. The Planning Act 2008 process was introduced to streamline the decision-making process for nationally significant infrastructure projects, making it fairer and faster for communities and developers alike. Consideration should be given to whether the MRWS process can be managed in a similar way to other nationally important projects.

Experience from similar processes in other countries should be taken into consideration in improving the process. As an example, the consultation process in the Republic of Korea leading to the selection of the Gyeongju site resulted in strong community engagement, with in excess of 90% of the community being in favour.

2. Ensuring MRWS is being considered by communities.

The Government should embark on a renewed drive to ensure that the case and potential benefits for hosting a GDF are drawn to the attention of communities and to encourage further local authorities to come forward to join the process. To accomplish this will require a proactive approach at all stages of the process. It is expected this would take the form of helping a community through all of the stages, but especially the initial stages of the process (i.e. through Stage 1). We expect this should be supported by Government to enable resources to be available (to be drawn on by a community); sufficient information to satiate questions arising from communities (from recognised experts); and sufficient clarity over the process in the early stage to ensure there is a structured approach that does not become overly burdensome to the tax payer. We note, unlike other planning processes, in which authorities have a statutory requirement to respond (to say yes or no), MRWS does not. As a consequence of this, it is difficult to establish whether there has been any substantive consideration from a community.

3. Make the process clearer and streamlined.

MRWS was designed as a flexible process without a clearly defined prescription for the individual stages. It is our opinion that without greater clarity the MRWS process will not achieve its intended outcome. It is recognised there is a difficult balance between being too prescriptive and allowing communities to proceed without undue pressure. However, greater clarity should be provided to the earlier (pre-commitment) stages to allow communities to at least understand the merits of participation in the process. Having established a simpler process, this should then be followed. Part of the confusion in West Cumbria arose from the establishment of an effective "Community Siting Partnership" prior to any Decision to Participate which is the reverse of what was set out in the 2008 White Paper, and possibly contributed to confusion in the decision making process and the roles of respective parties.

4. Provide better information.

We would expect to see significantly greater levels of pro-activity from all the key stakeholders. One important aspect of this would be in the area of provision of information and evidence for (or against) the case for the siting of a geological disposal facility within the boundaries of a community. These key stakeholders include government (DECC or appropriate government department), NDA RWMD (providing scientific and technical support), EA, ONR, local communities, local councils, NGO's and other interested parties. It might also help if there was a simpler GDF design proposal for communities to consider. At present, there are so many variables related to the GDF (inventory, design, operational period, nuisance factor impacts, inward investment opportunities etc.) that it is hard for communities to appreciate the potential benefits and disbenefits. The key stakeholders could do more to help the communities understand how a GDF might be tailored to fit into the local environment and what the real impact would be.

5. Understanding risk and benefits.

There needs to be a better appreciation by Government of the risks communities may face in making a decision to participate. This means having greater clarity of the types of risks (physical, environmental, radiological, commercial etc.), their magnitude (relative to other day-to-day and industrial risks) and the timescales over which they may occur. This will enable risks to be more clearly balanced by potential benefits that are realised in the not too distant future. Similarly the benefits also need to be clarified in terms of the nature of the community benefits package and its value and timing, and also secondary benefits that may accrue, such as from inward investments, additional employment, secondary supply chain opportunities, new infrastructure etc. The benefits package needs to be significant and clearly stated.

6. Better support to challenge.

This would provide an adequate level of reassurance to questions raised about the suitability of sites. NDA RWMD and supporting experts need to increase their visibility to provide scientific and technical information available, as well as being involved in constructive and robust debate, to support all stages of the process. DECC needs to provide practical support (and funding) to the community, to allow early engagement with

the community. The various regulatory bodies such as the Environment Agency should play a more important role in scrutinising information and provide independent guidance to communities. Many stakeholders (especially regulators) operate in a purely responsive mode because their statutory remit (which was never designed for the purposes of the GDF) allows them only to engage once a formal application has been made to them by the developer. This significantly reduces their ability to engage in a public debate during early stages in the MRWS process. A way of breaking out of this position would be beneficial.

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

1. A simpler, structured process for communities to follow
2. Readily available information for communities to draw on (on-line), including a much clearer representation of the scale of the GDF and its impacts to a community
3. Assistance to all communities at the very earliest stages of MRWS site selection process.
4. Assistance to communities with managing uncertainty and risks of participation in the process
5. Time bounding each stage of the MRWS site selection process. This will ensure the early stages of the process are either completed or brought to a timely conclusion. This will ensure processes do not drag on unnecessarily for Government or community.
6. A very clearly defined benefit package to enable communities to understand the merits of participation.

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

1. Better and earlier information on the suitability of their site to host a Geological Disposal Facility, and give consideration to reversing Stages 1 and 2 so that a community knows from the outset whether or not their location is potentially suitable
2. Greater clarity on the nature of the radioactive waste inventory which the community will host
3. Greater certainty in the waste packaging and disposal concepts to be used at the host's site
4. Clear statements (in layman's language) on the environmental and safety targets and impact that a proposed facility would have, supported by graphical simulations.
5. Clear statements (in layman's language) of the risks involved in hosting the GDF, with easy-to-understand comparisons with everyday well-understood events.
6. A very clearly defined benefit package to enable communities to understand the merits of participation.

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