

Review of the Siting Process for a Geological Disposal Facility: A Response to DECC Consultation from the UK National Nuclear Laboratory (NNL)

December 2013

The UK's National Nuclear Laboratory (NNL) is a Government-owned body, operating as a commercial business providing nuclear analysis, research, technology solutions and insight to customers in the UK and overseas. With over 10,000 man-years of accumulated nuclear industry experience, NNL hosts a large portion of the UK's nuclear research & technology knowledge.

This brief note provides NNL's response to the DECC consultation "Review of the Siting Process for a Geological Disposal Facility" launched in September 2013. We respond below to each of the questions raised in the consultation document.

1. Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place? If you do not agree with the need for such a test, please explain why.

Yes. A test of public support is an essential element of the principle of volunteerism. The local community must have a clear say in the decision-making process. There are a number of ways in which such a test could be carried out and we would not wish to be prescriptive in advocating one specific approach. The means chosen should be one which allows all members of the local community to have a say and it could be helpful if the community themselves were to have a say in identifying how the measure of support should be determined.

We feel such a test (in whatever form) should take place towards the end of the Focusing Phase, and the timing should be chosen so that it does not fall before the anticipated publication of significant new data or clarification relevant to the GDF process.

2. Do you agree with the proposed amendments to decision making within the MRWS siting process? If not, how would you modify the proposed phased approach, or, alternatively, what different approach would you propose? Please explain your reasoning.

Yes. We feel this process is a measured and proportionate one giving a clear voice to a potential host community and with ample time for relevant information to be obtained, shared, challenged and discussed. The adoption of learning and focusing phases should allow the process to progress at a rate that is appropriate for each candidate area without introducing unnecessary deadlines or artificial decision points.

Importantly, significant borehole work and ground characterisation precedes a final decision from a community to go ahead.

3. Do you agree with this approach to revising roles in the siting process set out in the White Paper? If not, what alternative approach would you propose and why?

Yes. These measures and roles allow all voices to be heard and they offer a proportionate balance between the necessary stakeholder engagement and the need to reach a solution to the important issue of GDF siting.

4. Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process? If not, what alternative approach would you propose and why?

Yes. Importantly we agree that the concept of a “best” geology is not a meaningful one and that there is a range of potential suitable geological settings in the UK. We agree that appropriate engineering work can be done in any of a number of suitable geological settings to deliver a safe, secure and effective GDF.

5. Do you agree with this proposed approach to planning for a GDF? If not, what alternative approach would you propose and why?

Yes. This approach worked well when applied to the nuclear new build programme and it is well understood by several key stakeholders including the communities around many of the UK’s nuclear sites.

There is no reason to suppose that the process would not also be suitable if applied to the process of determining a site for the GDF.

6. Do you agree with this clarification of the inventory for geological disposal – and how this will be communicated with the volunteer host community? If not, what alternative approach would you propose and why?

Yes. We support the definition of a Baseline Inventory as a step towards providing a clear context for meaningful discussions and decisions around a GDF.

We recognise the importance of providing enhanced detail regarding the types, quantities and characteristics of different classes of wastes as the process moves forward.

The importance of clear, simple, accurate and objective communication to stakeholders during this process on the form and features of different sub-sections of the Baseline Inventory cannot be overstated.

7. Do you endorse the proposed approach on community benefits associated with a GDF? If not, what alternative approach would you propose and why?

Yes. The principle of a community benefits package is central to the concept of community volunteerism. It is important that the scale and nature of the benefits package is clearly stated early in the process and we support the release of a proportion of the benefits during the Focusing Phase.

8. Do you agree with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF? If not, what alternative approach would you propose and why?

Yes. We recognise that GDF siting is a complex issue and we feel that the proposed approach to socio-economic and environmental effects is proportionate and pragmatic. It is important to engage early on these key topics with progressively more detailed work later in the process.

9. Do you have any other comments?

We have no other specific comments on the proposed siting process or the way forward.