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 disposal[1]. In 2008 the Managing Radioactive Waste Safely (MRWS) White Paper[2] 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 2013[3], 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.

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Department of Energy and Climate Change
Room M07
55 Whitehall
London
SW1A 2EY

Name	REDACTEDREDACTED
Organisation / Company	Wayfarer Project Services
Organisation Size (no. of employees)	REDACTED
Organisation Type	REDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACT
Job Title	REDACTED
Department	N/A
Address	REDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTEDREDACTED
Email	REDACTEDRDEDACTEDREDACTED
Telephone	REDACTEDREDACTED
Fax	N/A
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?**

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

The application of the MRWS process at present does not provide the near term incentives for communities to start and then maintain their involvement throughout MRWS, instead providing as yet undefined benefits (both in terms of scope and value) at an indeterminate point in the future after a final site has been selected (MRWS stage 6).

Any decision makers considering an EoI and / or DtP will need both visibility and guarantees of earlier and more tangible benefits realisation for that community in order to achieve local political and public support. Such a staged benefits process, of continuously increasing value that is enough to make a tangible difference to that community, even if it subsequently pulls out, (but with fewer communities as the MRWS process progresses), is more likely to encourage communities to get involved initially and want to stay involved.

A significant part of this would include more up front work on developing what these staged benefits would mean for specific communities so that local decision makers and members of the public can undertake their own qualitative assessments of whether initially joining and then and remaining within the MRWS process would be beneficial for them.

Too often, the benefits package discussed was too vague and distant that it was difficult to see how members of the public and / or decision makers could make positive decisions with all the uncertainly that accompanies such a decision, when the benefits were scheduled to be agreed or realised for 20-30 years after making a DtP.

As an example, when Shepway was considering making an EoI, potential sea defence work that could have been part of a benefits package was highlighted that would not necessarily have been relevant to any other community. Within a staged benefits package process, a community such as Shepway that made an EoI and / or a DtP but then withdrew or was excluded on technical grounds, would still receive tangible community specific benefits (such as 'financial support' for a sea defence scheme) as a recognition for their participation within MRWS, but less that that received by the final community selected.

As an example only of the staged monetary values that could stimulate a 'big bang' degree of interest in the MRWS process;

- each community that made a formal EoI could be awarded a value of £5 million (up to 10 communities)
- each community that makes a formal Decision to Participate could be awarded £10 million (up to 4 communities)
- each community that progresses to the site investigation stage could be awarded £25 million (2 communities only)

This would mean that any community progressing all the way to the end of MRWS stage 5 would benefit to the tune of £40 million irrespective of whether they decided not to progress and / or were deemed not suitable

following site characterisation. This funding would need to, and benefit from, being separated from discussion on the eventual benefits package for the community that final hosted the GDF (as part of a wider discussion with the Treasury), but would provide a clear incentive for communities to get involved and want to stay involved.

Certain conditions would need to be attached such as whether a weighting of an MRWS stage award would be needed e.g. 60% paid up front, 40% if the EoI stage was completed within 18 months including BGS screening and public consultation after which the award value would start to decrease. However, it would be important that each community was allowed to utilise its staged award as it saw fit and was the most appropriate to that community.

Recognising that such sums of money are not inconsiderable, it is worth noting that providing limits were placed on the number of communities that made, EoI's, DtP's and a decision to progress to MRWS stage 5 (as outlined above), the maximum total award value would be £140m. However, for this value to be reached would mean 10 communities would have had to actively make an EoI, something that has not happened to date.

In respect to funding such an approach, equivalent funding could be withdrawn from the NDA for ongoing decommissioning work throughout the estate on an 'as needed' basis. Although the potential £140m outlined is significant, there would be a considerable timing phasing of this that could be profiled across the 10-20 years and as mentioned previously, the total would only be required if 10 communities made an EoI.

Ultimately, the provision of a viable GDF would provide a focus and clear end point for the UK nuclear decommissioning industry that is currently lacking, to which £140m to get things moving could be considered a worthwhile investment.

In respect to the process for identifying communities within whom to engage with, I feel that whilst EoI's should still be encouraged from anywhere within the UK (excluding Scotland), the Government could be more proactive in undertaking early geological and environmental screening to identify potential suitable areas as occurred in the Swedish / SKB programme.

Previously, Nirex undertook the same process to down select certain communities on geological grounds but this was not undertaken in an open and transparent manner. This information is likely to be still relevant today and could be pursued further. In the same manner, this national screening could then be overlaid with environmental considerations similar to the Strategic Environmental Assessment (SEA) undertook by the Department of Energy and Climate Change (DECC) as part of the siting process for new nuclear build locations.

Such a process would need to be undertaken at a very coarse screening level, with a view that between 12-18 communities would be identified (based on geological and environmental grounds combined). Such processes already occur through the UK for major infrastructure projects.

The vital part of such an approach would be the communication that this in no way invalidates the voluntary nature of MRWS for any communities 'excluded', or that any community identified is not being pre-judged as formally entering the process. However, it would provide DECC with a focus for subsequent MRWS engagement on a smaller number of specific communities, instead of the previous approach which has been to passively wait for communities to come forward of their own volition, or focus on West Cumbria which has now failed to progress on two separate occasions.

I believe there is also a much greater role for the use of Health Impact Assessment (HIA) as a vehicle for stakeholder engagement tool to identify, quantify and enhancing the local benefits a GDF would bring whilst helping recognise and mitigate where possible any detriments of health. This will be particularly important in regard to the mental stress and anxiety associated with the fear of radiation having a much greater effect to populations compared to actual radiation doses.

HIA would also be of particular benefit in 'localising' stakeholder engagement discussions, which is covered in more detail further on.

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

The MRWS process is likely to benefit from a more pro-active approach by Government to go out and identify and then engage with local communities (see proposed coarse screening process outlined above). To date the level of interest from communities around the country has been low in comparison with other international programmes (Canada currently has 21) and a different strategy has to be adopted where there is a more targeted approach leading to a much greater level of awareness. Geological disposal is a very complex issue and only a few 'nuclear' communities have even considered it to date, but for various reasons they may not contain the best locations for a potential GDF.

This would also involve a more positive message about what the benefits the MRWS process / an eventual GDF would bring to a community (see comments above re: staged benefits packages). Based on the experiences of the previously failed Nirex, a very defensive, non-committal positioning regarding the GDF siting has occurred where a significant amount of effort has been were spent considering specific wording and approaches to communication in order to appease and / or not antagonise individual stakeholders, rather than promoting the benefits of what the GDF, the associated infrastructure and subsequent localised wealth creation would do to a local community.

If a project truly has the 'buy-in' from local communities, then the momentum do get things moving would override concerns about the use of certain wording within documents (e.g. 'a' GDF vs. 'the' GDF).

The 'what is the effect on me' question has to be answered, and not just at the county or borough level; there has to be tangible benefits that individual members of the public can relate to. A few examples of these could be;

- council tax rebates for those living within an area that is considered 'affected'
- support for training, e.g. children of those living within an affected area having University tuition fees subsidised, preferential apprenticeship schemes, etc.
- up front clarification / policy on what compensation process would be applied / paid out to anyone whose home is affected by 'blight'; a key consideration for any home / landowners within a community.

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

A much more rapid and flexible approach to stakeholder engagement needs to be adopted throughout the entire MRWS process / future stages. So far, engagement has been very formalised, controlled and detailed but this would benefit from a simpler, faster, more flexible and positive approach / messages to counteract the negative and spurious detractions which can appear rapidly and regularly using a wide range of evolving social media and the internet, and where any claims can be made without the same level of underpinning justification and yet are rarely challenged.

These is especially true where the younger generation are much more aware of the messages being communicated through these media outlets, but are less likely to undertake the level of investigative diligence on the claims made.

More understanding of the MRWS process by the local population within communities (but not necessary more information) has already shown a more positive 'buy-in'. Surveys of individuals within West Cumbria and Shepway that engaged with the information available, attended local events and talked to DECC / RWMD representatives involved in the process, had a notably higher level support for progressing to further MRWS stages than those who did not engage as fully. To achieve this though will involve more 'time on ground' and a local presence and / or the employment of local people early on; an approach SKB in Sweden adopted with positive results.

In West Cumbria, the engagement was very focused via the community siting partnership with DECC / RWMD being kept at arms length. This resulted in a 'managed messages' approach to information provision and resulting over or under emphasis on certain topics.

Community groups representative of the local population (socio-economic / ethnicity / cultural, etc) could help build the necessary momentum from within the community if they felt the continued involvement with the MRWS process was something they would derive value from, which in turn would translate into votes for local and regional politicians who ultimately would need to make key decisions at the different MRWS stages.

In order to achieve this, there would need to be a much greater focus on truly getting to know who the local population is and what their particular drivers are in order to assess how any potential MRWS / GDF implementation could lead to tangible benefits for them.

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