



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 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.
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

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>

the MRWS programme in west Cumbria and elsewhere. We are now inviting views on the 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.

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.
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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Or by post to: The Managing Radioactive Waste Safely team
Department of Energy and Climate Change
Room M07
55 Whitehall
London
SW1A 2EY

Name	
Organisation / Company	SKB International AB
Organisation Size (no. of employees)	
Organisation Type	
Job Title	
Department	
Address	
Email	
Telephone	
Fax	

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 responses:

- 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?**

As a waste management organisation with experience of establishing a siting process based upon the voluntary participation of interested and potentially suitable communities in the process we observed the following aspects:

- The MRWS process for the UK requires major decisions to be made between each of the stages.
- Decisions are placed on the community and it is not evident who is expected to make that decision.
- There was no clear advocate or driver for the project. The NDA RWMD as the implementer were participants, not drivers in the process. This appears to have created a space into which opponents of the project were able put forward views and information which is unchallenged, perceived to be fact and has left a number of issues that now need to be addressed.
- Decision makers need clear information on which to base any key decision.

The process produced a number of positive steps and demonstrated that progress in forming a relationship with a community is possible. The production of the MRWS Partnership report was a very positive step forward. It set out clearly areas where further information was needed and where more dialogue was required to understand the needs of the community. The work of the Partnership is to be commended and produced a sound basis for the building of a relationship with a community that is the key to the success of the project. There was no visible response to the needs of the Partnership in the Cumbria community and the MRWS process required a decision between stages 3 and 4. This decision was placed on the shoulders of the local politicians. They appear to be forced into a position that required them to make a decision of national importance amongst the perception that the information for the decision was not complete and ultimately leading to great political risk to them as individuals.

In this situation it may have been logical to suggest a further pause in the process to address the community issues and discuss with them how this could be done rather than force a decision.

The use of the term 'screening' with respect to the geology at this early stage is very

dependant upon the criteria used. Use of language in terms of developing the understanding of the geology in an area allows the implementer to show what already exists for an area and what the information gaps may be. This will be different for each area. Even in a 'uniform' hard bedrock such as in Sweden suitable sites and unsuitable areas can exist in the same community.

In the Swedish siting process:

It was essential to have an advocate for the project. SKB as the implementer of the geological disposal facility is responsible for driving the project and obtaining all the necessary approvals including the support of the local communities. The role of bodies such as the regulators, government is to give approvals based upon the evidence of the implementer that it has support for key decisions in the process.

A GDF is a facility that is needed by a nation with a nuclear power programme. This is generally accepted on a national level – the waste exists and must be dealt with. At a local level, often in a community familiar with the industry, there is also general acceptance of this need. In Sweden the wider region is not so involved. A national campaign using the waste transport ship Sygyn and visits to existing facilities was used to communicate what was planned together with the open invitation to volunteer should an area wish to become more informed or involved.

The Swedish siting process was based around the community being able to opt out rather than opt into the process. Following unsuccessful siting studies in the early stages a revised approach was that as the implementer SKB was clear about which areas it would like to investigate. SKB stated its intent to carry out a number of feasibility studies. These addressed socio-economic issues such as tourism, property values as well as technical studies such as geology/safety and engineering. The local decision makers could then ask for more information and 'allow' a feasibility study to be carried out (often as there were no grounds for refusal). Such an approach proved to be successful as it did not require decision makers to 'invite' SKB to study their area, rather the process was seen as something that was 'done to the community' in 'the national interest as the waste exists', with the leaders acting in the interest of the community not the GDF project.

This approach does not force the community leaders into making significant nationally important decisions; rather it gives them the power to engage in a matter of national importance with the ability to exercise a veto on behalf of their community.

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

It is essential that there is a clear advocate for the project and this should ideally be the implementer of the GDF project, NDA RWMD, as they have the information needed to communicate directly with potential communities. It is also important that the implementer is empowered to engage and negotiate on behalf of the project.

It is important to build confidence that the Government policy for a GDF in the UK can be implemented. The competence and skills of the NDA RWMD in understanding the wastes, the geology of the UK and research, development and demonstration (RD&D) into the technology for implementing geological disposal needs to be made visible.

A key feature of the Swedish programme in the early stages was visits to existing facilities and the development of new SKB demonstration facilities to demonstrate key aspects of the concept and the competence of the SKB organisation.

A particular issue from the experience in Cumbria is the geology of the UK. This needs to be addressed.

The communication of technical competence should be a key consideration for NDA RWMD.

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

A study of the UK geology could be used to open dialogue with communities. This is something that the UK Government could ask NDA RWMD to carry out to address the question, could the Government policy of implementing a GDF be done in the UK?

Dialogue and communication on aspects such as what information can and should be used and how much is known already about the UK geology could be used to start a dialogue with communities.

Like Sweden, there are already nuclear community groups who will have expertise and many decades of experience of nuclear issues. The question of dealing with the legacy is, we understand, already being addressed by NDA through liaison with such communities. NDA RWMD could utilise such established links through its parent organisation to further the discussion on whether such communities are interested in a continued relationship with the nuclear industry in the form of initiating studies regarding the feasibility of a GDF or if and how the waste they currently store will be removed.

Such communities are already 'affected communities' and could be considered as such with regard to the MRWS Process.

Other points:

Process needs to be flexible, not prescriptive.

Experience in Sweden was that it was very important to have a transparent and listening attitude resulting in changes in procedures, plans, time schedules and layout when appropriate or necessary in order to build trust and confidence. SKB learnt that there needs to be a basic understanding that this will normally take some time and should not be forced.

SKB found that there was a need for local actions and responses at the early stages. Operative field resources on all levels to give rapid, dedicated and continuous support for both decision makers and the public in and around participating communities are needed.

The Feasibility Studies included assessment of the technical areas of geology/safety and engineering as well as the socio-economic studies including impact on the environment. These latter areas addressed issues of interest specific to the community such as tourism, property values impact on local business. The communities were given the opportunity to suggest issues to be studied and to follow and influence these studies.

Added Value

In Sweden the discussions regarding the benefit to a community are framed in terms of the 'Added Value' of the project and the presence of SKB as a long term neighbour and part of the community.

In the early stages of the siting process the communities were able to access funds to support

their involvement with SKB. Such engagement and involvement allowed the communities access to studies, consultants, information and a better understanding of their community. Such studies were an excellent vehicle for engagement and were considered a lasting benefit to the local politicians and community.

Once the site investigations were drawing to a conclusion regarding the preferred site the community mayors initiated the discussion regarding the benefits to both communities who had invested many years in engagement with the project and SKB.

The Added Value programme was negotiated - between the two communities, SKB and SKB:s owners - reaching an agreement that the Swedish utilities would provide funding so that , over time , a total added value of 2Bn SEK would be created for the two communities.. 75% would be created in the community that was not selected for the GDF and 25% in the community who would potentially host the facility. Of this 80% would only be available after approval for construction was granted and 20% could be allocated up to this point. A mechanism has been set up for joint decisions on what initiatives that would be funded and the calculated added value that they would represent. A guiding principle for this mechanism is that added value initiatives must give long term positive effects for both the community and SKB and that the estimated added value exceeds the money invested.

(The funding is allocated through a special decision process and is available to projects which are considered to add value to the community often in terms of providing a pleasant and prosperous community environment for the families of SKB and other businesses in the area.)

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