



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.

Purpose of the call for evidence

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 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.

Response form

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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	REDACTEDREDACTEDREDACTEDRE
Organisation / Company	Underskiddaw Parish council
Organisation Size (no. of employees)	REDACTED
Organisation Type	REDACTEDREDACTEDREDACTEDRE
Job Title	REDACTEDREDACTED
Department	
Address	REDACTEDREDACTEDREDACTEDRE DACTEDREDACTEDREDACTEDREDA CTEDREDACTEDREDACTEDREDACT EDREDACTEDREDACTEDREDACTED
Email	REDACTEDREDACTEDREDACTEDRE
Telephone	REDACTEDREDACTEDREDACTEDRE
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 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?

This response is from Underskiddaw Parish Council in the District of Allerdale in the County of Cumbria. The Members of the Council studied the Consultation Document in detail, including a good deal of the background material supplied, they attended meetings and roadshows, and held an open meeting for Parishioners which was well attended. The outcome of this was that the Council made a response to the Consultation in the form requested and stated that they were unconvinced of the case for proceeding into Stage 4, and recommended the DMB's should decide to go no further.

Underskiddaw Parish Council (the Parish Council) agrees with the government policy to store nuclear waste in a GDF. They do not agree with the Government that a **totally voluntary** approach is the correct or most effective way to achieve a chosen site.

In order to work out how to improve the process it is necessary to look at what went wrong and to consider the reasons why the Voluntary approach, as practised in the West Cumbria consultation, is not correct

1. **It does not work.** Since the White Paper was produced in 2008 there have been 2 volunteers in 5 years. Voluntarism as practised so far does not appear to work.
2. **Safety was not the prime consideration.** The first criterion for a site should be that it is safe, not that it is willing. To spend time considering a volunteer area which is unsafe means that ultimately the GDF cannot be built there and so money, and more important **time**, is wasted trying to square a circle.
3. **Existing knowledge was ignored.** The criteria for suitable geology for a GDF have been internationally discussed and are reasonably clear: stable flat base rock, a depth of sedimentary cover, flat surroundings, and no active water systems (such as mountains create) running through the site. Once people realised how big the GDF would have to be it became clear that Cumbrian conditions didn't fit the picture. There was a lot of talk from those supporting a GDF in Cumbria about how little was known about the geology of Cumbria. It must be one of the most studied places on earth, even though some of the records have been lost, and there are hundreds of retired mining engineers, geologists, scientific academics and enthusiasts living here who couldn't believe what they were hearing.

4. **Decision making was entrusted to bodies which did not have the status or resources to deal with the responsibility.** Towards the end of the process it became clear that the only likely rock-type for a GDF (although not rock formation and surroundings) was in the National Park. In order to build a facility such as this in a protected area Copeland BC would have to show that this was the only suitable place for it. How is a Local Authority the size of Copeland with limited resources in every respect equipped to carry out the comparative studies required to demonstrate this? The appropriate level at which this matter should be decided is the national government. Only the Government has the resources and powers to carry out the comprehensive and comparative studies which are needed. It should step up and take the lead and not rely on soft options by passing the buck. This decision needs to be taken in the national interest, and a local authority does not have the scope or the remit to do this.
5. **Voluntarism is not always democratic.** The effect of entrusting the decision whether to proceed to District and County authorities is to enable a larger authority to “volunteer” to have a GDF situated in a host community which may not wish to have it at all. To the people most affected the process is therefore far from voluntary.
6. **The process generated high levels of mistrust.** This arose from the many ambiguities in the information provided, including responses by DECC to questions from the Partnership; the level of competence of the existing agencies (NDA etc) was called into question; many vested interests became apparent and others were suspected; the Right of Withdrawal which appeared to be unlimited and guaranteed at the outset began to dissolve into uncertainty as it was questioned – culminating in the Government’s failure to put it on a statutory basis in the period between September 2013 and February 2013.

Question 1 – what aspects of this process could be improved.

The Government must put the criterion of appropriate geology, and thereby safety, first. The Government should seek independent views at the highest level of expertise, and without any vested interest in the outcome, to review the existing knowledge about which areas have geology and geomorphology suitable for a GDF. If such experts consider that the existing level of knowledge is not clear enough, then the Government should commission a survey which would seek the evidence to identify areas suitable for a GDF. This must be a reputable survey : independent, authoritative and capable of being internationally recognised and respected. Spending money on this will save money later, because it should be so good it is indisputable.

Once these areas have been identified the Government should rule out any protected areas to avoid the burden of proving that any such areas are the only suitable site.

Only at this stage is it sensible to introduce the principle of voluntarism – and expressions of interest can be sought from the remaining suitable areas.

The government should also work on detailing the information which any volunteering body will need to have. Information should be clear about : safety; the physical impact on the community where it might be sited – its size, what will be visible, what would happen to the spoil, what kind of interim disruption would there be; the impact on the lives of a volunteer community; a clear and guaranteed package of benefits; the safety of the installations; the kind of waste to be deposited and over what timescale and so on. In short, the majority of questions which were asked in the West Cumbria process, and which we were told we would have to wait till later for the answers, would be answered clearly at least in outline.

The Right of Withdrawal, which in the West Cumbria process started off apparently clear but on examination became increasingly muddy, should be guaranteed to the host community by law.

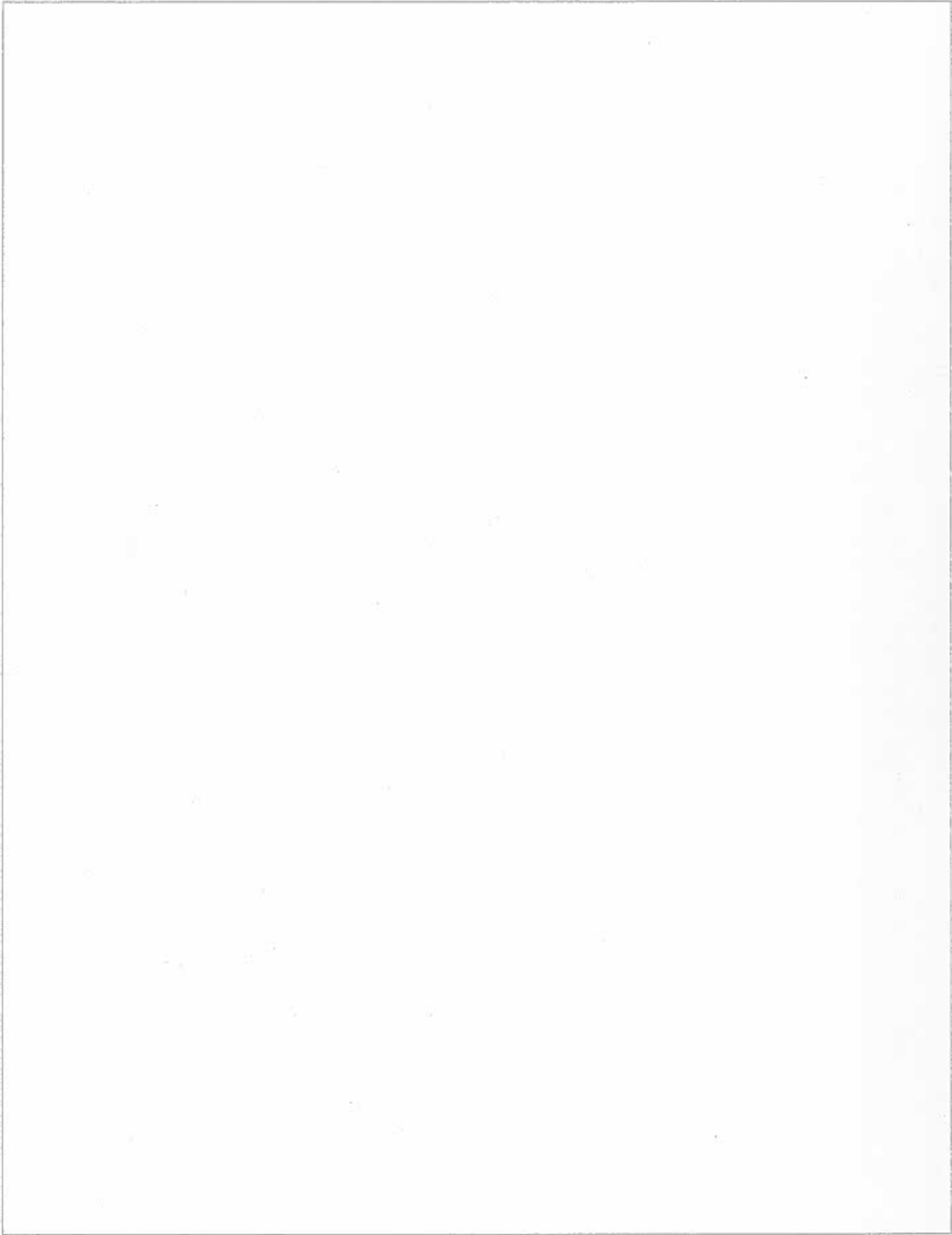
Question 2 What would attract communities to volunteer & to stay in the process

If people are dealt with openly and honestly and have a fairly clear understanding of what is involved, and if the reward for hosting a GDF is generous, they are more likely to volunteer, than for the unknown and unclear. They need to know absolutely clearly up to what point they can withdraw, so that they will be less hesitant at moving through the process.

In order to remain in the process Communities need to be assured by experience that the experts and agencies with whom they will have to deal are clean and transparent, and that if they have a vested interest it is clearly declared at all times. They need to know that the agencies are competent – that they can cope with the job of looking after nuclear waste safely, and the re-assurance about this needs to come from outside independent bodies, not from the agencies themselves. The Government needs to do some work on this – building up the Agencies whose failings became apparent during the interrogation in the West Cumbria consultation.

Communities need confidence in the integrity and competence of the bodies who will manage the whole project, and this confidence will only come from these qualities being demonstrated, not from being told they exist. Even from what came out from the West Cumbria consultation, and the more recent Audit, there is a great deal of work to be done here, and there is no place for complacency. In this period after the collapse of the process in West Cumbria it would be good to have some evidence that building up of competence is going forward.

Decisions should not be made on the basis of dubious polls, but by a properly conducted vote.



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