

Consultation on Managing Radioactive Waste Safely: June 2013

Review of the Siting Process for a Geological Disposal Facility

Thank you for the opportunity to present our views on the site selection process that should be followed since the conclusion of West Cumbrian involvement in the recent site selection process.

The Swarthmoor (SW Cumbria) Area Quakers along with other Cumbrian Quakers, with the backing of our national standing body in Britain 'The Meeting for Sufferings' of Britain Yearly Meeting, took a rigorous part in opposing the failed site selection process and we welcome the Government reviewing its processes in a way which is open, honest, rational and cohesive, in order to obtain the necessary resolution to this problem of the nuclear waste legacy.

As a preliminary, we believe that it is necessary to recognise that we should not be starting from here. Part of the process in future is the honest acknowledgement that there are wastes that have been generated unnecessarily due to a lack of scientific expertise or misapplication of the technology. The short termism of management at various nuclear establishments, side-lining wastes and neglecting facilities, has later become part of the long term waste management problem.

Learning lessons from these mistakes helps us to reduce the possibility of mistakes in the future.

In our view the process in future needs to consider the following:

1. Finding the safest location and the safest design for the disposal facility where there is the highest chance of producing a robust safety case **MUST** be the overriding motivation for the process. The utmost safety of future generations of all the peoples in the British Isles, and therefore by definition our geographical neighbours too, must be paramount.

This must be the goal, and not current political or scientific convenience and economic constraints.

2. The issue of nationalism needs to be acknowledged and explicitly countered. There have been statements in some quarters that nuclear waste cannot and will not be accepted in a devolved state. In this small group of countries forming the UK the nuclear process in all its positive and negative outcomes has been followed on behalf of the whole of Britain, producing waste materials that need to be kept safely on behalf of the whole community for tens of thousands of years. It must be acknowledged that should these wastes be mismanaged, and be deposited in geologically unsafe ground in untested and untestable engineering, then all peoples of these islands will reap the consequence in the future, regardless of geography or future national boundaries. So nationalism should be specifically excluded as a constraint upon the process.

To look at national boundaries rather than the safest geology places all future peoples of these islands in jeopardy.

3. We think it is irrelevant that a large proportion of the waste is already stored above ground in Cumbria. A significant proportion is not and transporting currently stored waste from Sellafield to a safe repository elsewhere is manageable and affordable relative to the cost (in economic and environmental terms) of transportation of the remainder of the waste to a potentially unsafe site in Cumbria.

The risks to the environment in the transport phase, which can be carefully planned and programmed, cannot outweigh the environmental risks posed in the many thousands of years following completion and closure of such a facility in sub-optimum ground.

4. The decision-making process on new-build nuclear power must not be allowed to constrain the waste disposal process. One of the drivers of the failed site selection process was the government policy advocating new-build nuclear stations. We take no position on the issue of new-build as part of this consultation. However we do believe that the nuclear waste legacy is so important, and is a significantly greater problem than any additional quantity of waste from any new build reactors, that the resolution of the legacy should not be used as a pre-condition for decisions on new-build.

The dangers of the wrong decision on the waste legacy far outweigh the usefulness of the linkage between such a decision and the authorisation of nuclear new-build.

The linkage once suited both the environmental movement and politicians but if new-build were to go ahead the worst of all worlds would result from allowing this issue to force a hurried and potentially unsafe decision on waste disposal. More time taken now to make the right decision would avoid potential devastation of future peoples who would have to live with the legacy of that wrong decision.

The safe management of spent fuel from new-build reactors will need very careful – and separate - consideration. This issue should therefore not constrain the decision process for a facility to contain the legacy waste.

5. The profound dishonesty of the failed siting process has always been transparent but needs to be recognised to avoid further mistakes, if the new process is to be robust. We point to the following examples exposing the hypocrisy of the previous process:

- a) The linkage between a refusal by the Cumbria County Council on furthering the (now failed) process and the halting of new-build, vouchsafed by politicians, their scientific advisors and by the media, implies a dishonesty in the process – how can the outcome not be pre-determined or pre-empted if such a linkage is made by those advocating the site search?

- b) That there was “no plan B to the Cumbrian option”, as stated publically on several occasions by site search officials, similarly implies in practice a complete lack of a rigorous, open-minded critical process.
- c) The often-quoted statement that “we are following international guidelines on geological selection criteria” is blatantly untrue.

This development in the UK, would have been, and may still be, perhaps the largest single purpose built nuclear waste facility in the world, the size of a small city. Neither Russia nor the US has created such a facility. The only comparable process has been in Finland and Sweden. In these countries the geological integrity of the ground was the over-arching first parameter. Only then was the issue of voluntarism introduced.

This great dishonesty in the previous site selection process must be a matter of history.

- 6. We suggest there are lessons to learn from the Swedish and the Finnish examples but they are clearly not the ones that the failed process tried to draw.

We suggest the right lessons from Sweden and Finland are fivefold:

- a. As noted in point 1 above, the search, based upon internationally-agreed selection criteria for the appropriate geology, from sites available throughout the British Isles, has to be overwhelmingly the most important safety criterion. This underpins all other aspects of the decision process.
- b. That in Sweden and Finland there is indeed a rational debate and a national consensus as to the need for the process. We consider this has not been apparent as yet in the UK because of inter-party and nationalist point scoring, by the new-build linkage complication, and by over-concentration on the environs of Sellafield by all the parties involved as the “obvious” option.

This latter aspect was identified as irrational and profoundly wrong by the Inspector in the report of the NIREX Inquiry.

- c. Given a. and b. above, and consequent trust in the process, in Finland and Sweden voluntarism and community involvement then did indeed have a role to play.
- d. Given trust in the process, even major towns in Sweden (Uppsala) and in Finland (Rauma) can live with waste disposal facilities in close proximity. A similar situation in this country (with major towns comfortable with close proximity to waste disposal facilities) would be a major political coup.

- e. Economic and social benefits – planning gain, a well known concept of community benefitting from major planned development – is warranted after site selection has been narrowed down to a locality. However, presenting such community benefits as part of the initial decision-making process amounts to bribery; to bribe a current population to accept a development that needs to be safe for thousands of years is immoral and should not be part of the process. This too was flagged up in the NIREX report.
- 7. From point 6a above it follows that some areas of the country should be specifically excluded – and some have already been so excluded. A major aspect of the site selection process in future has to recognise that we cannot rewrite history nor readily reclassify geology. Those areas, including Cumbria, that were excluded in the past for the search for such a repository because of their unsuitable and unpromising geology are well known and cannot be resurrected now because they would be more convenient, or cheaper in the short term, or more politically acceptable at the present time, than other areas. This history cannot be expunged and geological reality cannot be reordered.
- 8. A clear, consistent, rigorous and open planning process that gives sufficient weight to a coherent national strategy on nuclear waste management is essential.

It is no use pretending that a community will readily volunteer to accommodate such a facility. It is, above all dishonest, not just naïve, and it promotes profound cynicism.

The reality is that in the UK we are used to residents and pressure groups being well organised and politicians are also used to backing them if it is not to lose them votes. However, unpopular developments are implemented (high speed rail, road developments, airport runways) of far less profound social and historic importance, providing they stand up to planning and judicial scrutiny. The nuclear waste process to date clearly has not done so. Given a coherent and honest process we think this is the only way forward.

We Cumbrian Quakers are clear that if Cumbria had been the best place on safety grounds to bury the waste, this is where it should be. However we know it is not and the safety of generations of communities yet to come has to be our priority.

- 9. We are in a period of potentially rapid climatic changes and nor we can we predict very far ahead the economic health and social cohesion of our communities. Therefore this current process of decision making and the planned management of the resources to resolve the waste legacy must be robustly honest and transparent in its procedures. Its eventual implementation must be rigorously followed with the resources committed long term to ensure completely safe implementation and closure.

I hope you consider the above gives a coherent response to the question of a new approach to the siting process. We consider the process can be made more honest, can move forward and can even be healing in its progress rather than adversarial. In the short time we have available to respond to your consultation we cannot spell out further to you the way forward but based on the forgoing,

with a huge investment of truth, honesty and integrity, we think that progress can and should be made.

Politicians in recent times have a poor record of delivering truth, honesty and indeed competence (see the banking/ financial crisis bringing us to near penury) and so it is incumbent on spiritual communities like our own, Quakers, and others, to step forward and be involved.

Please be assured we, as well as other spiritual communities, as opposed to those with vested political and economic interests, are willing and ready to take part in this process crucial to the future well-being of all peoples of these islands.

REDACTEDREDACTEDREDACTED

REDACTED

Nuclear Issues sub-group, 8th June, 2013.

Swarthmoor SW Cumbria Area Quaker Meeting.

REDACTEDREDACTEDREDACTEDREDACTEDREDACTED

REDACTEDREDACTEDREDACTEDREDACTEDREDACTED