



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

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.

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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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	Shepway District Council
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 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?

Aspects of the site selection process we think could be improved

We think that more information should be provided on issues of interest to the local community before any decision is taken on whether or not to submit an Expression of Interest (EoI) or its equivalent in a new process. It should be possible to do this without incurring significant additional costs, at least in terms of the scope of the project. The information provided should respond to local concerns as they arise and be as area-specific as possible. An outline of some of the key issues which arose during our soundings process, which we suggest require the provision of further information in any new process, is set out in the third section below.

We believe that the Government, and DECC in particular, should be seen to be leading the siting process. The Nuclear Decommissioning Agency (NDA) clearly has a key role to play in delivery but there is a danger that it could be seen to be promoting a Geological Disposal Facility (GDF) in isolation from other issues affecting a local community. We therefore suggest that the siting process should be led as far as possible by DECC officials with the involvement of NDA staff being limited solely to the provision of technical information.

The local community should be allowed sufficient time to absorb and learn about the possibility of hosting a GDF before being asked to vote or otherwise express an opinion. Some people will find the idea shocking or difficult to understand so we suggest a period of at least several months between announcing the idea and asking local people for their views, during which time all of the arguments for and against can be debated in depth. The quality of debate locally will depend on the range and depth of information available, as referred to in the first paragraph, but allowing local people sufficient time to consider the information and weigh the issues is of equal importance.

If the concept of an EoI stage is retained in the new process, we believe that you should consider providing some financial assistance to Local Authorities before any decision on whether or not to submit an EoI is taken, rather than no funding being provided until after an EoI has been submitted as in the previous process. This would encourage and enable Local Authorities to be involved and would allow them to provide more information to their community, thus facilitating a more informed choice on whether or not to proceed further.

Our experience, based on the soundings we took from local people and the subsequent political debate, is that a decision to submit an EoI is seen as a beginning of the siting process. This is at variance with the White Paper and views expressed to us by DECC, which is that an EoI should not be considered in this way as there is no substantive commitment to the process unless and until a Decision to Participate is submitted. Any new process should address this difference in perception and enable local people to find out more information without any inference that the siting process has begun in that area.

Geology and its relationship to potential locations for both underground and surface facilities will be a key issue for communities. We think that you should consider instructing the British Geological Survey (BGS) to carry out part or all of the preliminary desk-based studies as early as possible in the process, and certainly before local people are asked to form a view on whether or not an EoI should be submitted. We do not believe that this work would be too costly, particularly in view of the scale of the project and as the number of areas to be investigated would probably be low.

The June 2008 'Framework for Implementing Geological Disposal' focuses on the 'voluntarism and partnership' approach as a means of siting of a GDF to be the right way forward. Whilst the voluntarism route has successfully been adopted in other countries where GDFs have or are being developed, we believe there could be lessons learnt from the details within these voluntarism approaches that could be included in any new process.

What could be done to attract communities into the site selection process

The potential scale of employment, financial and other benefits of being involved in the process should be quantified and spelt out in clear terms at the outset, in particular the likely value of the benefits package. This would enable local people to weigh up the potential benefits against the potential risks and come to an informed opinion before being asked to express a view on whether or not an EoI should be submitted. We consider this to be the single most important change which can be made to increase the chances of any new process based on voluntarism being successful.

From the outset of the soundings process undertaken in Shepway, we experienced a gathering momentum of negativity towards the submission of an EoI, mainly through a lack of readily available relevant information. This became clear through the responses received from the local community which identified their concerns around such issues as public health, environmental damage, unsuitable geology, flooding, waste from other countries etc. We believe it would have been helpful if the Government, and more particularly DECC, had provided information early on to address these concerns and also information focussing on the key benefits, such as the number and types of jobs (i.e. high quality skilled and technical rather than unskilled), the likely numbers of peripheral and support jobs that would be generated and the type and scale of the benefits package (with particular reference to the issues and needs of the area).

From experiences in Cumbria, and to a lesser extent in Shepway, greater clarity on issues around democratic accountability and decision-making may allow other local communities to feel more comfortable about becoming involved in the process. Local people should be able to explore the possibility of hosting a GDF in an open-minded way without feeling (even if incorrectly) that they are making any sort of binding commitment from the outset or that decision-making will be taken away from them as the siting process proceeds. The June 2008 'Framework for Implementing Geological Disposal' was intentionally vague about definitions of

'Host Community' and 'Wider Local Interests' and did not provide any guidance on necessary levels of support in either community for the process to continue past any key decision point, nor on recommended means to establish the views of these communities. In our view, some quantitative guidance in these areas would be beneficial in reassuring local people and allowing a 'Decision Making Body' to show that it is following the Government's guidance in addition to general good practice. More guidance on the following specific aspects would also be helpful:

- The differing account taken ('weighting') of views expressed by people who live in the potential host community area as opposed to those who live further away but who may still be affected by the proposal, for example as a result of the transportation of waste through their community.
- The community's rights to exercise the Right of Withdrawal. This should address concerns that it may become increasingly difficult or even impossible to do as the project progresses i.e. as the costs incurred increase and perceived momentum builds.
- Responsibilities for, and influence over, decision-making of local and neighbouring councils at parish, district and county levels, particularly if not all of these councils agree
- The form, powers and democratic accountability of 'Community Siting Partnerships' (or their new equivalent)

Information which would help communities engage with the site selection process

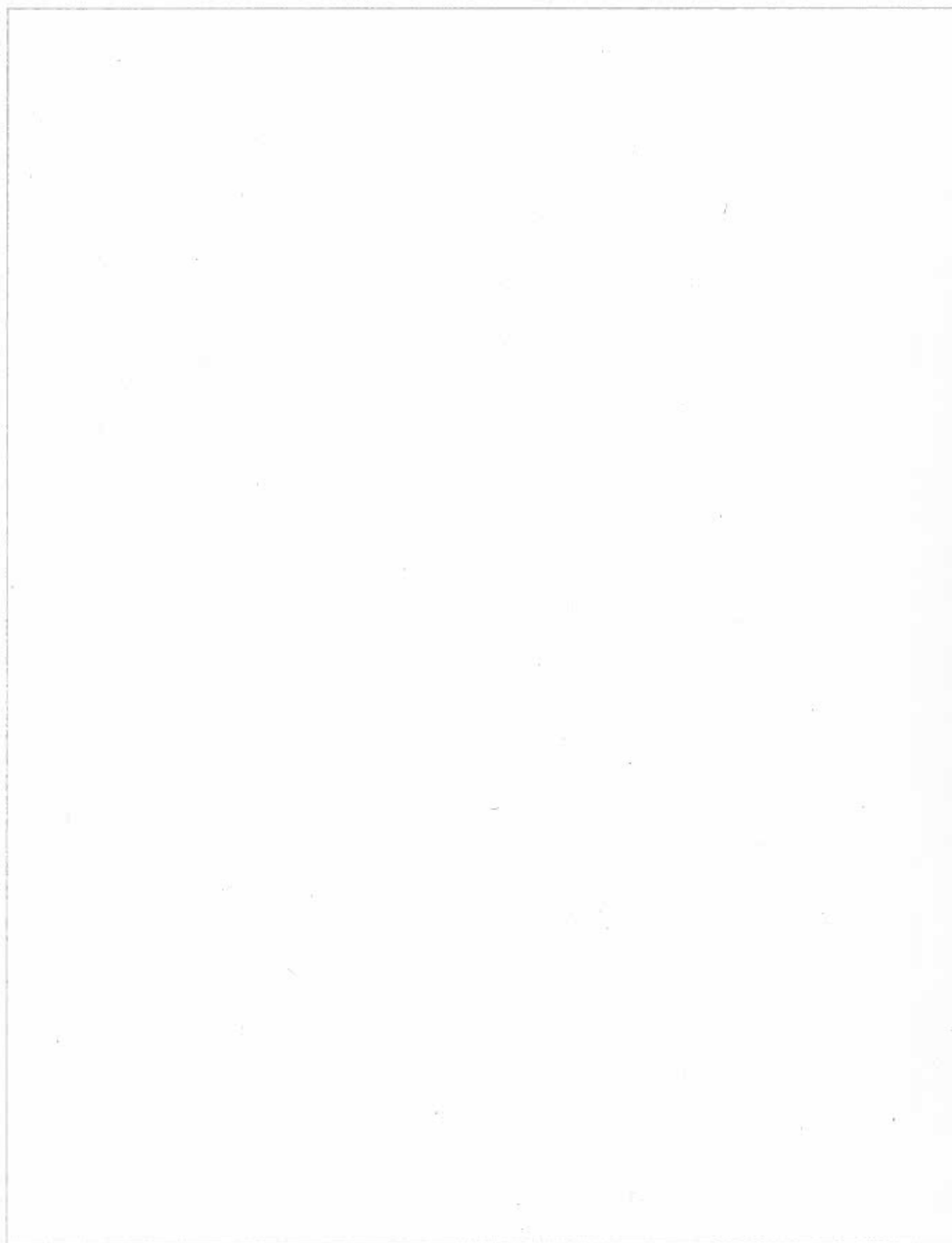
In general, information provided to local communities must show both the positive and negative potential effects of involvement in the site selection process in an open, honest and balanced way. Local people must be presented with, and also feel that they have been presented with, factually correct and balanced information. Any perception that a GDF is being forced on a local community, or that the information and arguments presented are not factually correct and balanced, is likely to turn communities from engagement towards opposition.

General concerns for local people will be the potential effects on house prices, businesses and tourism. Our view is that more information than in the previous process should be provided at an early stage to enable local people to reach an informed decision on possible effects, both positive and negative. Whilst it is understood that it will probably not be possible to provide much information and analysis on local issues until the later stages of any new process, it should be possible to provide generic information covering experiences to date in Cumbria, Shepway and in other countries. Without such information and analysis there is a natural tendency for local people to focus on the potential negative effects, since many of these are more obvious and easily understood than some of the potential positive effects. It is worth bearing in mind that peoples' homes and jobs represent personal security so they are unlikely to want to even consider moving from the status quo unless there are very good reasons to do so. It is therefore essential that local communities understand the potential benefits of involvement as well as having at least some answers to issues of concern at the earliest opportunity, to avoid the risk of an early decision not to be involved further before the issues have been examined in any depth.

With regard to specific issues, nuclear safety will be a key concern for many local people, in relation to both public and environmental hazards. As much information as possible should be provided on issues such as long term safety, monitoring of radiation in the environment, the control of gases, degradation of waste containers and transportation methods, routes and associated safety hazards. As in other areas, the information should be structured so that simple concise information is provided with the ability to 'drill down' to increasing levels of detail

or those who wish to.

Finally, we believe that the wider picture of the UK's nuclear new-build programme and the international approach to nuclear waste disposal, including legacy waste, should feature more prominently in information provided and discussions about the site selection process. It became clear to us from our involvement that these matters were far from resolved and could have a major bearing on the size, nature and timing of any GDF. There was some concern within our community that although their initial agreement was required to host a GDF for legacy and some new-build waste it would not subsequently be required to significantly expand the facility to deal with a much larger new-build programme and even different types of waste or spent fuel. Would it be possible, for example, to limit the size and type of the waste inventory that could be disposed of in a GDF without further agreement by the community, thus ensuring that their agreement would not be open-ended?



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