

Evidence submitted to the Consultation on Review of the Siting Process for a Geological Disposal Facility

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This evidence is submitted on an individual basis. The views expressed are therefore those of the witness and not necessarily those of the affiliated institution or research sponsors.

Question 1: Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place?

A clear measure of local public support should certainly be secured before the representative authority loses the Right of Withdrawal. A decision to seek a measure of public support should be taken late in the focusing stage when detailed development plans have been made available for scrutiny and consultation shows that the local community consider that they have received sufficient information and engagement to make a decision. A local referendum would seem the most appropriate and transparent way to seek public support, with provision to continue consultation and development of the evidence base, in addition to proceeding with or withdrawing from the process.

Question 2 – Do you agree with the proposed amendments to decision making within the MRWS siting process?

The proposed amendments to the decision making process are both sound and welcome. To support decision making it will be necessary and important to provide independent support to decision making bodies throughout the siting process to assist in the appraisal of siting and development plans at each stage.

Question 3 – Do you agree with this approach to revising roles in the siting process set out in the White Paper?

The proposed revision to roles and responsibilities is logical and will bring clarity to the siting process. Learning from the MWRS process. Government should make clear the mechanism for resolving any unforeseen ambiguities in the roles and responsibilities of stakeholders that may arise at a future date, to mitigate potential impact on the siting process. Provision of advice to local communities and peer review of technical statements (2.82-2.85) both demand transparent, independent and authoritative opinion, but are distinctive activities. Hence, separate advisory and peer review bodies are likely to be required to safeguard against any conflict of interest. Expanding the role of CoRWM to provide advice to local communities demands very careful consideration. Such a change of remit would place a substantial extra burden of work on this key advisory body and could lead to perceived or genuine conflict of interest in advising both Government and local communities.

Question 4 – Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process?

The proposed approach is a sound advance on the earlier MRWS siting process. The publication of regional geology in advance of a call for volunteers and staged development of this information during the siting process, in partnership with the representative authority, are welcome proposals. It is clear that expert opinion and technical peer review will be particularly important in supporting this process during both the “learning” and “focusing” phase, given uncertainties in knowledge. To be credible, it is important that such opinion and peer review is independent, authoritative and engaged in through a transparent process. As noted below, developments in waste management practice could significantly impact key aspects of the

Disposal System Safety Case and site selection criteria during both the “learning” and “focusing” phase. In particular, opportunities to reduce the inventory, volume and number of packages of waste emplaced in the GDF impact on the potential for: human intrusion; gas generation; groundwater migration; detriment to the environment and landscape; demands for transport and infrastructure; and cost, timing and ease of implementation. Consequently, there is a need to ensure that such beneficial impacts on the siting process are appraised and exploited at the earliest opportunity.

Question 5 – Do you agree with this proposed approach to planning for the geological disposal facility?

The proposed approach brings clarity to the planning process and is therefore welcome. The approach maintains democratic accountability whilst making provision for the expertise and resource required to plan and deliver a project of national significance.

Question 6 – Do you agree with this clarification of the inventory for geological disposal – and how this will be communicated with the volunteer host community? The proposed clarification of the disposal inventory is welcome will assist in building public confidence in GDF siting and operation. Given the uncertainty in future waste arisings, the proposal to initially define a single baseline inventory, with a later programme to define waste characteristics, is logical. Future innovations in waste treatment may drastically reduce the inventory and volume of radioactive waste, and improve the long term integrity and safety of the waste packages, consigned for disposal. Periodic appraisal of the potential impact of such developments on the Baseline Inventory should be undertaken by the appropriate organisations and the outcomes communicated to stakeholders during the siting process. Such developments may be particularly important, for example, in enabling future retrievability and reducing the risk of human intrusion by reducing the number of packages and volume of waste emplaced in the GDF.

Question 7 – Do you endorse the proposed approach on community benefits associated with a GDF?

The provision for staged and proportionate release of community benefits is fair and addresses a key concern of communities involved in the MWRS siting process, the approach is therefore welcome.

Question 8 – Do you agree with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF.

The provision to bring forward aspects of the socio-economic, environmental and sustainability assessment to earlier stages of the siting process will assist in developing public confidence in the approach and is a welcome development.