



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](mailto: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 disposal<sup>1</sup>. In 2008 the Managing Radioactive Waste Safely (MRWS) White Paper<sup>2</sup> 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 2013<sup>3</sup>, 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

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<sup>1</sup> 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.

<sup>2</sup> 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>

<sup>3</sup> 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.



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?

We agree wholeheartedly with the comments made by both REDACTEDREDACTEDREDACT (the latter on behalf of SPAND) in their responses to your consultation. As such we do not intend to highlight the obvious shortcomings that thankfully lead to the failure of the MRWS process in Cumbria. It is a scandal that it was allowed to progress as far as it did wasting both time and money.

The fact that the nuclear industry is in the area around Sellafield is a by-product of the war. Originally there were factories producing TNT at Drigg and Sellafield and these were superseded in 1947 by a processing plant to provide nuclear warheads for the MoD. The site then extended. Now that there is a large and ever increasing percentage of the Country's nuclear waste already at Sellafield this is no excuse for ignoring the area's known geological deficiencies. These should have ruled it out from the start as being a possible candidate for the construction of a GDF. Other parts of the country are known to contain areas where there is a good chance of finding the required geology for the construction of a SAFE (or as safe as is possible) underground repository for nuclear waste. It has been suggested that some of these areas are on land already owned by the MoD.

Besides the points raised by REDACTEDREDACTEDREDACTED we believe the following are of relevance:

- 1) Responses to letters sent to the DECC were of a standard format and failed to answer the points raised in the original letters.
- 2) Being repeatedly told that a proposal has popular support (based on a discredited Ipsos Mori opinion poll) was frustrating.
- 3) The potential damage to Cumbria's tourism economy was played down. In fact Cumbria Tourism, which should have been watching its members' interests, was noticeable by its initial silence. Whilst probably untrue, it has been suggested that REDACTEDREDACTED was too closely connected to the MRWS process, as REDACTEDREDACTED is associated with produced a lot of the REDACTEDREDACTED for the project. As a last fling of the dice there was an offer from

the Government of £500,000 to protect the Lake District's image, if the Councils gave their consent to progress to stage 4. This could be seen as belated recognition that it would create a problem.

- 4) The Lake District is one of the most beautiful and loved parts of the UK yet it became more and more apparent that the NDA had hopes of finding a site for its GDF beneath a part of it. Due to the limited amount of reporting of the issue in the national news media, there was very little public awareness outside Cumbria about what was happening (in fact there was a lot of unawareness within Cumbria itself). Once people became aware of the situation, they were horrified - hence the petitions. Even if it had been decided to construct a GDF outside the boundary of the LDNP, there would have remained an overwhelming amount of opposition, due to safety concerns exacerbated by the suspect geology.
- 5) The problem of nuclear waste is a national one not just a local issue. Even when the NAO brought out its damning report about the dangerous storage conditions at Sellafield it seemed to hardly warrant a mention in the national news media. The report was issued on the day that the US presidential elections results were announced. It is imperative that the Government ensures that the necessary funds are made available to upgrade the current storage facilities and this will remain a requirement even if a decision is eventually made to construct a GDF elsewhere.
- 6) The fact that the MRWS partnership was supposedly preparing its report to advise the DMBs, it was for us a matter of concern that representatives from the three Councils had such an influence over the drafting of the report. The presence of the Leader of Copeland Council at the Partnership meetings was very noticeable. Her enthusiasm for the MRWS process is well documented.
- 7) Whilst the three Councils were supposed to be the DMBs in reality the decision was to be made by a very limited number of Councillors – those in the Executive or Cabinet. Remarkably in the case of Allerdale the seven councillors did not even see fit to give their fellow members an opportunity to express their opinions. Of those seven councillors five live in Workington, an area that never stood any chance of having a repository built underneath it! In short the decision was to be made by people who were not going to be directly affected by any construction.
- 8) It was blatantly obvious that our local MP, an ex-Nirex employee, was totally in favour of progressing right to the end of the MRWS process. So with the Executive Committee of the local council and the local MP being so in favour of continuation there was a real danger that the views of concerned residents would simply be ignored. Thank goodness the Cabinet members of Cumbria County Council listened. This was despite the pressure put upon them by Baroness Verma and others from DECC.

**In conclusion** the whole MRWS process, as it was carried out in Cumbria, has caused many

to get a better understanding of the issues (including costs) involved in the storage and disposal of nuclear waste. Whilst the MRWS process should have been seen to have been carried out in an open and transparent way to engender trust, this sadly has not been the case. The integrity of some Councillors, MPs, the BGS, the NDA and even DECC might all be called into question.

Lessons need to be learnt, if the process is to be carried out to find an alternative volunteer community:

- 1) This time it is essential that an assessment of the geology is carried out first. The NDA's belief that it can engineer solutions to compensate for deficiencies must not be relied upon, as none of these have been tested satisfactorily for anything like the timescales that would be involved.
- 2) Clarification is required to establish what is a "host community" when it comes to the exercising of the right of withdrawal. The situation in West Cumbria proved to be very unsatisfactory, as the views of the real potential host communities were in grave danger of being completely disregarded by the official DMBs.



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