

## Response form

Please use this form to respond to this 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  
Room M07  
55 Whitehall  
London  
SW1A 2EY

Name	
Organisation / Company	
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?

Would you like your response to be kept confidential? If yes please give a reason

Carts before horses go backwards in circles[until they notice and change it]

No

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.

For a number of decades HMGs of all 3 persuasions have sought to legitimise their determination to bury nuclear wastes in Cumbria. Historically this has meant unwarranted interference in the Lake District joint structure plan, a spurious research programme by NIREX to fabricate a case for a Cumbrian disposal site, and more recently, an out and out attempt to manufacture consent, enchantingly known as 'Managing Radwaste safely'. This latter exercise was, of course, in flat contradiction to HMG's very own code of practice on consultation. The next episode in this cyclical process is not difficult to predict. The recently launched centralised arm of the Cabinet Office called the Major Project Authority is the bulldozer that will overrule any objection to the Highspeed Rail link, proposed newbuild Nuclear power stations etc & etc.

This of course makes nonsense of the lip-service the MWRS white paper pays to what it calls 'Voluntarism', but then the propaganda machine will make a big play on how 'undemocratic' the approach was to designate the County Council's Cabinet as 'key decision making body' when the clear candidates for such decision making are-'naturally'-the borough councils whose cabinets agreed to proceed with MRWS next stage.

The democratic deficit that characterises the entire shameful history of the nuclear industry's 'waste disposals' matches the purblind ignorance on which such proposals have hitherto been premised. A case in point is the recent discovery of several canisters of waste in the English Channel that, it was confidently assumed in the 50's & 60's, would by now have totally disintegrated and their payload dispersed.<sup>4</sup>

As this is being written, DECC are announcing tighter restrictions to enable local communities to veto windfarm development. This initiative identifies the parish or even smaller unities as the rightful decision maker over the siting of new wind turbines. The MWRS process drew in the umbrella organisation for Cumbrian parish councils for what was called a 'partnership'; of course that did not mean that CALC made the least contribution to the decisions when, eventually, they were made. But if local interests matter when it comes to nasty windfarms, why can they be excluded from consultation when it comes to a [hold your nose] 'geological disposal facility' ?

When a proposed windfarm is the subject of planning procedures, there is no question as to where the turbines are to be located; without pinpointing grid references, there is no plan at all.

When it comes to a GDF, we are not allowed to be site-specific about it until after the decision has been taken to become a host community. This means, conveniently, that authority to make that decision can be juggled around in order to produce the right answer. Once a host community has thus been identified, it will be up to those who made the decision to appease the people whose actual territory it is, under which, [hold your nose], the nastiness will be buried. So the people whose house prices will be afflicted, who will have to move out or put up with gargantuan quantities of spoil trucking its way out of the ground and along their roads to some immense slagheaps somewhere else, will have no veto, no right of withdrawal and no possibility to take part in a decision which will already have been taken by someone else.

But the Govt. will not be able to pretend that it had no part in it; or that it was the democratic result of an impartial process with no predetermined outcome. A community finding themselves fingered for a dump will, naturally, look for champions who will take the matter through the courts and on to Strasbourg, and the same argument that is offered for objections to windfarms will be used against the GDF, namely that the community that is most directly affected should have a veto on whatever the council chamber cabal has foisted on them.

With so long a history of self-delusion and bad faith, HMG needs to recognise that it has become unfit to arbitrate on the issue and should, instead, make proper provision for secure immobilisation and storage of this material so that, hopefully, a less compromised authority sometime in the next century, can reach decisions about its ultimate fate. After all that is the earliest that much of it will become sufficiently passive for burial.

And, oh dear! It should heed the main conclusion of the Flowers report, that there should be no question of further newbuild before an integrated and adequate strategy for waste is in place.

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4 <http://www.spiegel.de/international/europe/legacy-danger-old-nuclear-waste-found-in-english-channel-a-893991.html>