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

Or by post to: The Managing Radioactive Waste Safely team
Department of Energy and Climate Change
Room M07
55 Whitehall
London
SW1A 2EY

Name	REDACTED
Organisation / Company	REDACTED REDACTED
Organisation Size (no. of employees)	REDACTED REDACTED REDACTED REDACTED
Organisation Type	REDACTED
Job Title	REDACTED REDACTED REDACTED REDACTED
Department	REDACTED REDACTED REDACTED REDACTED
Address	REDACTED REDACTED REDACTED REDACTED
Email	REDACTED REDACTED
Telephone	REDACTED REDACTED
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 If yes please give a reason	No But please do not publish my contact details!

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?**

In response to this Call for Evidence and the specific questions posed, I structure this response around four key issues, with specific recommendations for action. I would be pleased to provide further comment and detail, if required.

1. The Right of Withdrawal from the site selection process.

Cumbria County Council (CCC) highlighted *"the need to strengthen the right of withdrawal, to make it legally binding"* as a key concern in its letter to Baroness Verma (DECC Parliamentary under Secretary of State), dated 01.10.12. Writing to CCC in March 2013, Baroness Verma opined that *"The Right of Withdrawal had not been enshrined in statute because Councils do not need statutory powers to withdraw from a voluntary process. Nonetheless, at your request, we undertook to make the Right of Withdrawal statutory, subject to future agreement with local Decision Making Bodies that this was the best option."* It is clear from the minutes of the CCC Cabinet Meeting held on 30.01.13, which resolved not to participate in Stage 4 of the MRWS process, that undertakings provided by Government were not sufficient to meet the concerns of CCC.

In taking forward the MRWS process, Government should give consideration as to how the Right of Withdrawal from the siting process can be safeguarded in law at the earliest opportunity. This should include consideration of how different elements of local government (e.g. Borough and County Councils) engage with the MRWS process to exercise the Right of Withdrawal.

2. Negotiation of community benefits.

CCC requested further clarity concerning the negotiation of community benefits in relation to hosting a national Geological Disposal Facility (GDF), in their letter to Baroness Verma (01.10.12). The minutes of the CCC Cabinet Meeting held on 30.01.13, make clear that the clarification provided by Government was not adequate.

In taking forward the MRWS process, Government should consider developing and

publishing a framework for negotiation of community benefits at the earliest opportunity, with appropriate consultation.

3. The scientific basis for radioactive waste disposal.

In its letter to Baroness Verma (01.10.12), CCC highlighted that *"the suitability of the geology was of paramount concern to many residents of Cumbria due to the lack of definitive information presently available"*. The minutes of the CCC Cabinet Meeting held on 30.01.13, make clear that members did not have sufficient confidence in the scientific basis of radioactive waste disposal to agree to continued participation in the MRWS process. The Leader of CCC summarised this issue, as follows: *"To some extent, these diverging opinions - geological, scientific, environmental - along with earlier studies, such as those of Nirex, have contributed both to the confusions and, indeed, the concerns expressed by many. And we have seen that confusion in some of the thousands of email and letters we have received."* The lack of confidence of local stakeholders in the scientific basis for radioactive waste disposal highlights a *critical disconnect* in engagement between scientists, implementing authorities, national and local government, and local residents. If the MRWS process is to develop successfully, the confusion and concerns on behalf of local stakeholders concerning the credibility of scientific evidence to support safe disposal of radioactive wastes must be acknowledged and adequately addressed. In part, this confusion and concern undoubtedly stems from the fact that detailed scientific consideration of potential disposal sites was not scheduled to take place until the later stages of the MRWS process.

In progressing the MRWS process, Government should give consideration as to how local stakeholders can be supported to develop confidence in the soundness and trustworthiness of the scientific evidence, at each stage of MRWS process, such that an objective and reasoned synthesis of diverging views can be made. Government should look to the example of the equivalent process in Sweden to understand how local stakeholders have been successfully engaged in building such confidence.

Government should consider how elements of the scientific investigation programme could be brought into an earlier phases of the MRWS process. Government should look to the development of the successful counterpart programme in Finland to understand how (high level) independent site evaluation can be undertaken to screen potential volunteer communities at an early stage, providing confidence, in principle, of the suitability of the local geology, as an enabler to successful community engagement.

In supporting independent scrutiny of radioactive waste management and disposal strategy and implementation, Government should consider whether the Committee on Radioactive Waste Management is sufficiently resourced to scrutinise the MRWS process as it develops in later stages, in which the work of the Committee will inevitably increase.

4. Interim management of radioactive wastes.

Government is correct in its belief that near surface storage of radioactive waste is not a sustainable long term management strategy (Point 10 in the Call for Evidence document). A key lesson learned from the MRWS process, and the successful counterpart process in Sweden, is the expectation that the implementation timetable may be delayed so that the concerns of local and other stakeholders can be recognised and adequately addressed. However, the age and condition of some UK radioactive waste storage facilities, combined

with the wide distribution and varied inventory of higher activity wastes, requires progress toward geological disposal at the earliest opportunity. Clearly, there is a risk that transfer of waste from legacy storage facilities to new temporary stores, awaiting further treatment or conditioning prior to ultimate disposal, may prove problematic and expensive if the timetable for a Geological Disposal Facility is significantly extended, to enable stakeholder, technical or other issues to be addressed.

Government should consider a reappraisal of its approach to interim radioactive waste management, incentivising operators to condition radioactive waste to be suitable for interim storage and final disposal at the earliest opportunity. Government should consider incentivising operators to minimise the volume of conditioned waste as far as possible; this may, for example, require reappraisal of the waste transfer pricing arrangements to provide the necessary commercial driver for waste volume reduction. This approach would provide Government with greater flexibility in selecting a disposal site, since the production of conditioned waste packages with enhanced passive safety and minimum volume will enable:

- ***Reduced reliance on the geological and engineered barriers by enhancing confidence in the performance of the waste package.***
- ***More robust models, with reduced uncertainty, to support operational and post closure safety assessment of a GDF.***
- ***Overall environmental impact of the GDF construction to be minimised, through reduced transport and excavation, together with earlier closure.***
- ***The cost of extended long term storage and ultimate disposal to be minimised, whilst simultaneously enhancing safety and security.***

This approach would also build confidence in potential host communities by demonstrating, through actions, that Government, implementing authorities, and regulators are committed to safe radioactive waste disposal.

Please note that the opinions expressed here are mine alone and do not necessarily reflect those of REDACTED REDACTED REDACTED

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REDACTED, 9 June 2013.