

## **Review of the Siting Process for a Geological Disposal Facility, September 2013**

Sellafield Ltd response to the consultation – Review of the Siting Process for a Geological Disposal Facility

Sellafield Ltd, the company responsible for safely delivering decommissioning, reprocessing and nuclear waste management activities on behalf of the Nuclear Decommissioning Authority (NDA), recognise that the UK Government policy for Higher Activity Waste is geological disposal preceded by safe and secure interim storage and that the Managing Radioactive Waste Safely (MWRS) programme is the vehicle for implementing this policy.

Sellafield Ltd supports this review on the siting process for a Geological Disposal Facility (GDF) but, until a facility becomes available, recognises that long term safe and secure stewardship of higher activity waste and nuclear material is a key mission for NDA and at Sellafield is the responsibility of Sellafield Ltd as the site license holder.

This is reflected in our strategy for Sellafield Ltd which identifies that the safety and security of the Sellafield site and our employees continues to be our number one priority. This will meet the NDA objectives to ensure that all wastes and nuclear materials are stored safely, securely and effectively in a manner that protects people and the environment while complying with UK government policies.

In meeting this, Sellafield is already home to a number of modern interim storage facilities for higher activity waste and detailed plans are in place to ensure that waste from aging legacy facilities are retrieved, treated, packaged and transferred to these facilities on the Sellafield site. These waste retrievals have already begun and will continue over the next few decades.

Although this programme is not dependent on the UK finding a location for a GDF, the timely implementation of a GDF has an important impact on Sellafield Ltd's site activities longer term. Whilst not on our immediate horizon, the absence of a GDF would have a significant influencing impact on the end state for the site and the associated ongoing costs for interim storage, including replacement store costs, security and other associated costs.

In response to the Review of the Siting Process for a Geological Disposal Facility, Sellafield Ltd have the following comments:

Question 6:

Sellafield Ltd welcomes the clarification of the Baseline Inventory for geological disposal. As the custodian of the majority of the highly active waste and nuclear materials in the UK, it is important that the inventory for the proposed GDF is made 'more clear' as this will help us develop and inform strategies for the periods of interim storage.

It should also be noted that, while the baseline inventory includes Spent Fuel (MOX) from conversion of the UK's plutonium stocks, Sellafield Ltd is carrying out work in support of the NDA on Pu disposition, as part of a work programme being carried out by DECC/NDA on three

options for reuse. This includes the UK Government's current preferred approach to reuse this material in the manufacture of mixed-oxide fuel (MOX) for use in reactors in line with the consultation on the long-term management of UK-owned separated civil plutonium (December 2011).

Question 8:

While recognising that the consultation is for the siting for a GDF and that the UK Government's policy is deep geological disposal, the process may benefit from a more complete understanding of the detrimental implications of alternative outcomes. An example would be to consider the potential impact of ongoing 'above ground' stores if the GDF didn't go ahead and the impact this may have on the longer term Sellafield Ltd decommissioning programme, interim storage programme, the environment and local socio-economics.

Question 9:

The document refers to the inclusion of further governance (peer review, use of experts etc) of the underpinning science and engineering without giving any details of how this will be enacted. As an experienced operator of nuclear facilities Sellafield Ltd would strongly endorse the need for good governance of the science and engineering activities. We would recommend that these are documented in more detail, including the role of existing bodies such as the UK regulators, CORWM etc.

Yours Sincerely

George Beveridge  
Deputy Managing Director  
Sellafield Ltd