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Ref: DSG(2014)C037 26th May 2014

DECC

Dear Sir/Madam

DOUNREAY STAKEHOLDER GROUP (DSG): RESPONSE TO DECC'S CONSULTATION ON THE MANAGEMENT OF OVERSEAS ORIGIN NUCLEAR FUELS (ref URN 14D/010).

The Dounreay Stakeholder Group (DSG) is represented by over 20 organisations and therefore this response is one that is generally agreed by most organisations. However, there are some organisations, who may not agree entirely with this submission and therefore these organisations have been encouraged to provide their own response.

Consultation questions:

1. **Are there any possible consequences of this proposal which the Government might not have anticipated?**

It does not reduce the UK waste inventory if the waste is kept here, which it most probably will and is allowed for in the policy proposal. Indeed, the overseas customers have in some cases no facilities to receive waste or recovered nuclear material because they may no longer have the capability.

While recognising that UK nuclear sites conducted business with approved states consideration should be given to those previously benign overseas states which might become 'rogue', therefore keeping the waste and fuel in the UK is safer.

2. **Are there any significant factors that we may have overlooked or under/over estimated that would influence our decision on the NDA's proposal?**

Some of this material is non-standard and therefore it should be safety conditioned as waste for interim storage if this is possible. However, there may be an argument for keeping some of the material in a form for future re-use and this should be considered on a case by case basis. If interim storage becomes the preferred option then stores should be designed to be easily retrieval and not inter-mixed to allow appropriate decisions to be made.

In addition, the Dounreay Exotic fuel must be characterised and assessed for suitability for geological disposal which can only be done generically at present as no site has been identified. Given these materials will be going to Sellafield it would be for the Cumbria stakeholder group to make comment.

3. Are there any general comments that you would like to make?

It would be useful to understand the requirements of future reprocessing of new nuclear build, which ought to be factored in to Thorp (or son of Thorp) and the economics of marginal reprocessing activities. It would be useful if UK Government made their views known on this matter. While we recognise that new build is currently based on once through there would be no requirement for reprocessing. However this may change as new build options continue.

Yours sincerely

Sent electronically without signature

REDACTED
DSG Chairman