

1 Do you agree with the Government's preliminary view that the class or type of practice set out in the application submitted by the Nuclear Industry Association:

(a) qualifies as a new class or type of practice; and

**Yes, it qualifies.**

(b) is a suitable class or type of practice for a decision by the Secretary of State? If not, why not?

**Yes, it is suitable for a decision.**

2 Does the application contain sufficient information to enable the Justifying Authority to make an assessment of the class or type of practice in the application? If not, what further evidence is needed?

**Yes, there is more than enough information.**

3 Do you have any comments on the arguments or evidence in the NIA's application? Are there any additional arguments or evidence which the Justifying Authority should consider?

**This should have been a relatively straightforward process; two simple decisions to be made. There is a lot of information in the NIA application. It would have been helpful if the key attributes for a typical practice had been set out. Against this the NIA application could have made clear how the proposal differed from current practices. (with underpinning information as relevant).**

**The legislation seems to set out that nobody can carry out this practice (build and operate an ABWR) if not first Justified by the Justifying Authority.**

**However, it does not follow that, because a practice is Justified that it WILL be carried out.**

**The information, therefore, to make such a high-level decision (assessment of the theoretical benefits weighed against potential detriments) might well have been set out on two sides of A4.**

4 Do you have any other comments on the Secretary of State's preliminary view of the class or type of practice, on the approach of the NIA, or any other options?

**One assumes this is the start of a rigorous assessment process.**

**It is not clear whether the next stage is to assess if the proposed reactor type is suitable for building in this country. If so, much more rigorous questions would need to be asked. For example, the proposal states that:**

**"The UK ABWR is based upon a design which is proven and successfully operating elsewhere in the world."**

**This statement is misleading if not straightforward misinformation.**

**Whilst it is true that some reactors have been built and commissioned, as the proposal itself notes, there is only the experience of four operational units, which may have not achieved the output expected, and one was shut down following the Fukushima incident.**

**Of the remaining 9 planned ABWR projects, 1 in Japan has been suspended, 2 in Texas have been cancelled and 2 in China are subject to numerous delays.**

**It is therefore disingenuous to claim "... proven and successfully operating ..."**

5 As part of the further consultation on the draft decision document, the Secretary of State proposes to run public engagement events. Do you have any suggestions about the format of such events?

**The recent public consultations on the future of nuclear waste management – and the continuing furore created by mismanagement of the fracking issue – show how easily the debate can be mishandled and mistrust exacerbated.**

**Any public events should be as part of a continuous and comprehensive national debate on energy and climate change and a clear and coherent case on the viability and appropriateness of nuclear power as part of that debate is still required and should include:**

- **an explanation of the role of nuclear power in a mixed portfolio including renewables that does NOT include fossil fuels**
- **how the UK government plans to move towards that mixed portfolio**
- **clear policy on the future management of spent nuclear fuel and of reprocessing and nuclear wastes, whilst also ensuring the highest environmental and geological safeguards are respected and not finessed, for example for the sake of steering the site search for waste repository(ies) toward more politically pliant hosting communities.**
- **discussion on how to develop an understanding of which nuclear generator option (EPR, AP1000 or ABWR) is the best for UK energy security**

**Two issues should be made abundantly clear.**

- **It MUST be clear that laws will NOT be changed to make unpopular decisions easier to push through in the teeth of opposition – as has been suggested to enable fracking, and as in the proposed removal of the County level of consultation in Cumbria on nuclear waste disposal site search.**
- **THERE MUST BE NO SUGGESTION OF BRIBERY, 'SWEETENERS' or INCENTIVES (see fracking debate and nuclear waste site search!) Communities should not be offered "community benefits".**

**Rather communities should be persuaded by rational arguments on the benefits of hosting nuclear power plants and related infrastructure and they and the whole country need to be satisfied that generations unborn many years in the future will not pay the price in their safety and health for the sake of nuclear management expediency and inadequately conceived and ill-planned proposals now.**

**Robert Straughton,**

**On behalf of Swarthmoor SW Cumbria Quakers**