From: REDACTED [REDACTED]
Sent: 30 May 2014 13:35
To: DECC Overseas Fuels; coordinator consultation (DECC)
Subject: Foreign Fuels Consultation

I am aware this consultation has closed but we have had a computer breakdown and seeing the importance of this issue I am sending our response below and trust you may still be able to include it in your considerations.

REDACTED, Clerk, Swarthmoor SW Cumbria Quakers. tel REDACTED

Consultation
The Management Of Overseas Origin Nuclear Fuels Held In The UK

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

Difficult to tell from the information – or lack thereof – presented in this paper.

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?

Yes. See comments below

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

Yes.

Paragraph 40 states *"The Government considers that it is right for the NDA to assess, and if appropriate, implement alternative options for the management of overseas-origin fuels if this will secure best value for the UK taxpayer."* This is true, but there is little evidence in this paper that ***any*** clear and thorough assessment has yet been carried out to enable anybody to decide the *"best value"* – or any value at all.

One would expect NDA to have "considered" this option amongst several others anyway as part of good strategic business management. However one would also expect the NDA to present a credible case for this option to HM Government; something that showed that a detailed and thorough assessment ***had*** been carried out.

On the evidence of this paper this is not the case.

For example:

In paragraph 6 the paper notes *"The Credible Options paper set out the possible options for the future of reprocessing at THORP and identified the need to procure replacement highly active storage tanks (HASTs), required to handle the highly active wastes produced by reprocessing, at a capital cost of nearly £500M, should THORP continue to operate significantly beyond 2018."*

In this context what counts as "*significant*"? One month? Six months? Two years?

Again, paragraph 14 states that the proposed approach will be beneficial *"... by avoiding the need to replace supporting HASTs, at significant costs..."*

Certainly £500m sounds like a significant cost. However, what of the cost of interim storage – potentially for a "significant" time – involving the possible replacement of storage facilities and related infrastructure, including treatment of waste arisings? Is this an "insignificant" cost? If calculated, has it been compared to the cost of replacement HASTs. This paper does not say; it does not mention it at all.

Paragraph 32 considers the challenge presented by some of these non-standard fuels and goes on to say *"This does not mean that they cannot be reprocessed in THORP only that it could take a disproportionate amount of effort, time and cost to reprocess them."* The word "disproportionate" is not defined or quantified; nor is the effort, time and cost involved to prepare these fuels for interim storage prior to disposal.

Note 9 (page 14) states *"Small amounts of the remaining fuel was imported into the UK nearly 50 years ago ...* ". So how was it planned to treat this material originally? Why was no treatment undertaken before? If challenging to reprocess, what efforts have been made to understand and overcome the challenges in the last 50 years?

What has been done since the fuels where received to identify and assess research and technology needs and costs of the various options (reprocess / transport elsewhere / long-term interim storage / disposal in GDF) to manage them? If the assessment work has been completed why not set out the findings in the proposal? If the work has ***not*** been completed how can any credible decision be reached?

On a general note, does not reprocessing and treatment of wastes put the activity in spent fuels into a safe and stable form – eg, vitrification or

cementation - rather than storing those fuels in the Thorp pond? Is this not a better option for interim storage prior to disposal?

Paragraph 4.41 of the Exotic Fuels Options paper states:

"We believe that our arrangements for the interim pond storage of AGR fuel are the best available option. However, we do not assume that pond storage will remain the best option for such a long period, especially if the timescales for the availability of a GDF were to be extended. Therefore we will continue with our work on alternative options to wet storage, including dry storage and the early packaging of fuel for storage pending disposal. This will allow us to decide and underpin how the AGR fuel should be stored for the long-term and align this decision with the timescales and concepts for the geological disposal of spent fuels."

So some assessment work ***has*** been undertaken – but there is nothing in the proposal that shows how the costs balance between the options.

and in Paragraph 4.42 ...

"To support our study we also commissioned NDA's Radioactive Waste Management Directorate to undertake a disposability assessment of AGR fuel. The disposability assessment was undertaken and issued to NDA in 2010. The findings of the work concluded that AGR fuels should be suitable for geological disposal if appropriately packaged. Further work was recommended to optimise the disposal concept for AGR fuel and address some uncertainties associated with its disposal."

What is the status of the work? Are there any remaining uncertainties and risks? Does this add to or the assessment of the balance of options? One cannot tell from the paper.

Paragraph 37 states that the Government *"... accepts that if the NDA was required to keep operating THORP solely to manage small amounts of spent fuels then it would be an inefficient use of resources and would potentially divert resources from the major clean-up and decommissioning projects at Sellafield."*

Perhaps this would be better phrased as *"The Government accepts that the NDA* ***might be*** *required to keep operating THORP solely to manage small amounts of spent fuels* ***but that is not clear from the information set out in this paper****. If so, then it* ***might be*** *an inefficient use of resources and* ***might*** *(if not managed properly) potentially divert resources from the major clean-up and decommissioning projects at Sellafield."*.

In addition, maintaining ponds (and infrastructure) for storing fuels for up to 100 years must surely represent both significant cost and delays in decommissioning – but this is not set out in the paper either.

If you cannot quantify the risks of managing an uncertain quantity of fuel for an uncertain length of time with an uncertain future destination/disposal how can you compare with a decision to ship fuels elsewhere or reprocess? How can you make ***any*** sensible business decision?

JC. for Swarthmoor SW Cumbria Quakers. May 2014.

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