From: REDACTED [REDACTED]
Sent: 24 April 2014 13:39
To: DECC Overseas Fuels
Subject: FW: Consultation on the Management of Overseas Nuclear Fuels Held in the UK

Dear Sir/Madam

The NuLeAF Steering Group considered the above consultation document at its meeting on 9 April. NuLeAF accepts that the costs associated with maintaining THORP operation to complete outstanding overseas contracts are likely to be significantly greater than the costs associated with virtual reprocessing (substitution) which would allow NDA to close out all of these remaining contracts. In these circumstances virtual reprocessing will likely reduce the liabilities for UK taxpayers.

However, the NuLeAF Steering Group wishes to seek clarification from Government on the following points.

1. The consultation document includes no information on actual costs. What is the actual assessed financial impact of the proposals?

2. Have all the options for completing overseas contracts been fully considered? NDA say overseas reprocessing was considered but ruled out because of transportation and materials repackaging costs. However in some instances repackaging may be needed for transportation within the UK, and to meet NDA geological disposability requirements. Are there other UK facilities that could offer a materials processing option to enable some or all of these overseas contracts to be completed?

3. Will the decommissioning and clean-up programme at Sellafield be impacted by continued overseas materials storage pending disposal to a GDF? The volume of materials may be relatively small but presumably there will be an opportunity cost. Assuming NDA is to continue working within existing budgets, will any planned decommissioning and clean-up work not now be done, or deferred, as a result of retaining overseas nuclear fuels on the Sellafield site?

4. Will any plutonium be added to the UK civil stockpile, and what materials have, or will, be offered in exchanged?

5. The consultation document advises approximately two tonnes of material is currently held at Dounreay and will need to be transferred to Sellafield to enable Dounreay site decommissioning to progress. What are the assessed impacts of this transfer? Have the implications of potential Scottish referendum outcomes been assessed? The consultation is silent on these issues.

NuLeAF would welcome a response on the above matters when DECC publishes the outcome to this consultation.

Sincerely

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NuLeAF
NUCLEAR LEGACY ADVISORY FORUM

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