



**NGO Forum Minutes**  
**Wednesday 24<sup>th</sup> January 2019**  
**Manufacturing Room, Institute of Mechanical Engineers,**  
**St James Park, London**  
**13:00 – 15:45**

## **1 Introductions**

Co-Chairs of the Forum Stephen Speed (SS) and Professor Andrew Blowers (AB) opened the meeting. SS congratulated AB for receiving the prestigious Alexander and Ilse Melamid Medal from the American Geographical Society; an accolade which recognises outstanding work on the dynamic relationship between human culture and natural resources.

SS noted apologies from the Business and Energy Minister (Richard Harrington) as he was unexpectedly called to Parliamentary business. The Forum expressed their disappointment at this turn of events.

SS requested a change to the agenda, switching items 5 (re: Emergency Planning Regulations) and 6 (re: Climate and Siting). No objections were made from the Forum and the change accepted.

## **2 BEIS Update**

SS provided an update to the Forum on BEIS matters:

- **Moorside:**
  - Toshiba announced in November that they had taken the commercial decision to wind up NuGen.
  - The land at Moorside is owned by the Nuclear Decommissioning Authority (NDA) and it will now revert to them.
- **Wylfa:**
  - Hitachi announced in January that they had decided to suspend the Wylfa project.
  - Hitachi have stated their intention to discuss the future of the Wylfa site with HMG. We intend to work closely with them in the weeks and months ahead.
- **New Nuclear Financing:**
  - HMG continue to review alternative funding models for future new nuclear projects including a 'Regulated Asset Base' (RAB) model.
  - In 2016 the RAB model was applied for the first time to a single asset, construction stage project – the £4.2bn Thames Tideway Tunnel, being built under a 25km stretch of the Thames in central London.
- **Sizewell C:**
  - EDF maintain their ambition in Sizewell C



- **Bradwell:**
  - CGN maintain their ambition at Bradwell.
- **Small Modular Reactors (SMRs):**
  - 8 Advanced reactor consortia were given grant funding last year to carry out feasibility studies, with an announcement later this year for a second round of funding for successful bids.
  - We are aware that the UK SMR Consortium, led by Rolls Royce, has bid for funding from the Industrial Strategy Challenge Fund wave 3.
- **Geological disposal facility (GDF)**
  - The responses from the working with communities consultation was published in December 2018.
  - In parallel Radioactive Waste Management (RWM) Ltd (a subsidiary of the NDA) opened their Site Evaluation consultation which is open until 31<sup>st</sup> March 2019 to engage with interested host communities.
  - A GDF requires a National Policy Statement, which is in development and underwent parliamentary scrutiny in 2018.
- **Energy White Paper**

The Secretary of State for BEIS (Greg Clark) gave a speech in December 2018 which referenced an Energy White Paper to be published in Summer 2019.
- **EU Exit**
  - The Nuclear Directorate (ND) continues to work on progress towards EU and Euratom Exit.
  - All legislation in this policy area has been passed by Parliament, and as a result the relevant international agreements are in place ahead of need.
  - The Office for Nuclear Regulation are working on implementing the safeguards regime.
  - The arrangements needed for nuclear safeguards are in place should there be a no-deal Brexit.

Other items raised during this update session of the Forum were related to **safety & security**. BEIS note that the UK will undergo a review of the regulatory approach to radiation by the IAEA in October 2019. Pete Wilkinson (PW) enquired if NGOs will be able to input into this review – BEIS respond that this review is led by IAEA and not BEIS.

BEIS note that the use of drones at Gatwick Airport in December 2018 led to reviews of arrangements at nuclear facilities and lessons were learnt from the incident. Neil Crumpton (NC) informed the Forum that concerns were submitted regarding drone attacks 4 years ago.

**BEIS Action: Check on concerns submitted by the Forum referencing drone attacks on nuclear installations**



On a similar note, Jo Brown (JB) enquired if Bristol University drones are being used to monitor air emissions from nuclear sites. The regulators note that these drones aren't appropriate for nuclear sites as they are intended for accident scenarios. They also informed the Forum that there is a continuous monitoring process in place for air discharges.

- Additional comments raised in this item include: David Lowry (DL) enquired about the consultancies contacted when BEIS considered alternative funding mechanisms for new nuclear. BEIS note that a response would be provided outside of the Forum meeting, as the question is too detailed.

**BEIS Action: Provide information on the consultancies used by BEIS for alternative funding mechanisms**

- The Forum requested to understand the type of SMR applications received by BEIS. BEIS referred the member to the ANT website where information on the bids can be found and details on the Nuclear Sector Deal. Abstracts from the AMR competition participants can be found [here](#).

Lastly, Co-chair Stephen Speed informed the Forum of the side-meetings that had taken place between BEIS and NGO Forum members since the last Forum meeting:

- In November 2018, Senior Civil Servant (SCS) for Nuclear Resilience and Non-Proliferation, Graham Webber, and his team held a session on emergency planning and resilience with NGO members.
- A meeting was arranged for NGOs by RWM in December 2018. However this was re-arranged to provide members with a more informative meeting following Government's announcement on the GDF process after RWM's site evaluation Working with Communities policy announcements.
- A meeting was held between Richard Bramhall and Deputy Director for Radioactive Waste & Decommissioning, Umran Nazir to discuss a Joint Fact Finding (JFF) approach for Low-level radiation risks.
- A meeting between Neil Crumpton and the BEIS analysts is in the process of being re-arranged [update: this has now been arranged for April 2019].

## **2.1 Summary**

Co-chair Stephen Speed provided an update to the Forum on important nuclear matters, including the latest following the suspension of the Horizon project at Wylfa. Other points to note include the importance of drones for nuclear facilities. The item was ended by summarising the continuous engagement between NGO members and BEIS aside from the Forum.

## **3 Radiation Risks**

Co-Chairs Stephen Speed and Andy Blowers note that the Forum continue to make progress on issues raised by members, including on a JFF approach to low level radiation risks.



Richard Bramhall (RB) provided the Forum with background on radiation risks, noting that current radiation protection is policy-based safety, when it should be more evidence-based policy. It was put forward by the member that the ICRP principles are insufficient due to the risk from internal exposure (e.g. from uranium dust). BEIS responded that experts will critically review the body of evidence presented to them and policy is driven by science.

PW provided clarification on the **structure of the JFF proposal** that was being put forward:

- JFF aims to come to a mutual agreement about a series of issues that two parties currently do not agree on.
- The parties would come together on a panel, consisting of approximately 6 people (not necessarily expert).
- The scope of the work would look to unpack the issues of concern and examine the underlying reasons behind decisions.
- The process was attempted previously through national nuclear dialogue via BNFL.
- The approach aims to find agreement on experts involved, administration, budget, findings, etc.
- A JFF report will not lead to agreement over radiation exposure, however it is a good way to start a dialogue.

BEIS provide apologies for Umran Nazir (SCS who led the side-meeting with RB and PW). SS thanked RB and PW for following up on the side-meeting with Umran and providing an update to the Forum on JFF.

SS informs the Forum that the JFF approach may not necessarily allow a consensus to be reached on the low-level radiation issues of concern. There is a large body of evidence to consider and this was previously considered by COMARE. In addition, it may be also be difficult for a panel of 6 people to scrutinise the body of evidence and reach a conclusion.

Concluding remarks from BEIS on JFF noted that BEIS are not scientists or regulators, and so are not best placed to be part of the JFF approach. However, BEIS could work with NGOs to find the right counterpart for this dialogue. The Forum requested that BEIS utilise their contacts to determine the appropriate counterparts to progress the discussion.

**BEIS Action: Continue discussions with RB and PW on potential counterparts for JFF.**

Additional comments raised in this item include:

- JB asked the Forum if radioisotopes are tested for via Francis Crick institute in London.



**BEIS Action: Understand if radioisotopes are tested at Francis Crick**

- RB claimed minutes from previous meetings (referenced 2016) were not representative of discussions, with additional concern that a specific set of minutes was not published on the GOV.UK. BEIS will provide RB an update on this directly.

### **3.1 Summary**

BEIS and the Forum discussed a JFF mission to investigate radiation risks and have taken on an action to work with the NGO forum to find an appropriate counterpart for the mission.

## **4 Siting**

Andy Blowers (AB) opened the item noting that the recent announcements relating to projects being pulled or suspended at 3 sites (Moorside, Wylfa and Oldbury) had resulted in an increased focus on the 'remaining' sites, noting Bradwell and Sizewell. AB raised the importance of the need for nuclear and suggested that the NPS was being progressed based on an inaccurate need for nuclear.

AB informs the Forum of the updated **climate change and sea level rise** forecasts that have been published and the importance of this being considered against each of the sites that have been proposed on the NPS. BEIS state that climate change forecasts are considered and reviewed throughout the siting process.

The risk of **flooding** was discussed in more detail; with members noting that parts of Sizewell and Bradwell are in flood zone 3 and suggested they are only included in the current NPS (EN-6) for essential need to deploy before 2025. It was claimed that Sizewell and Bradwell are the worst sites for nuclear reactors, particularly in relation to coastal processes and flooding.

The Forum suggested that several changes should be made to the **siting process**: Flood zones should be deemed exclusionary; assessors should use worst case scenarios from modelling; assessors should consider entire site and over the whole lifetime of the plant. In addition, the need for siting criteria to factor in waste storage on site after its operational lifetime was also noted.

Specifically, there was concern expressed by the Forum in relation to the treatment of flooding in the on-going **Sizewell C Stage 3 Pre-application Consultation**. Mike Taylor (MT) claimed that flood risk assessment was not carried out during this stage, and that generally there was limited information being supplied by EDF to the public, with no responses received by members from EDF on request for information. BEIS informed the Forum that this was a matter for EDF and agreed to forward the concerns to EDF.

**BEIS Action: Inform EDF of the concerns raised and that no responses have been received by Forum members on requests for information**



MT noted that the issues raised about the new NPS in a paper provided at the last meeting. BEIS are in the process of producing a written response to the issues raised and to the drafted paper and will circulate in due course.

#### 4.1 Summary

The Forum discussed the importance of climate change, sea-level rise and flooding to the siting process for new reactors and put forward several changes to the process. There was concern that EDF were not carrying out a flood risk assessment during Sizewell C Stage 3 consultation and that EDF were not engaging with the NGOs.

### 5 Emergency Planning Regulations

Apologies received from Sean Morris, the NGO Forum member who contributed to this item.

Graham Webber (BEIS, Deputy Director for Nuclear Resilience and Non-Proliferation) opened the item noting the session that took place on emergency planning with some members of the Forum November. GW informed the Forum that current work includes the team preparing for **two Statutory Instruments**:

1. Transport of Radioactive Material: Changes include new criminal offences, and any transport of radioactive substances along waterways. This has been laid in parliament and will be debated in the House of Commons on 28<sup>th</sup> January 2019.
2. Radiation emergency preparedness (REPPIR): REPPIR 2001 is being replaced with a 2018 Statutory Instrument. The aim is to lay this in parliament in March.

ONR are producing an ad-hoc guidance and there will be a public consultation on the content of the guidance. GW also noted that the definition of emergency is no longer only being considered as a biological dose but will also include economic and wider effects.

Specifically, GW provided a brief summary of the **changes to be made to planning zones** for nuclear reactors:

- Detailed Planning Zones (DPZs) to be replaced by risk assessment (written with information from operator hazard report) and implemented by ONR;
- DPZs are designed for foreseeable emergencies;
- Local authorities are now responsible for planning development. The statutory duty of the Local Authority will be overseen by ONR
- Outline Planning Zones are a new category of planning zones and are to be used for unforeseen accidents with worst case scenarios in mind;
- Information on Outline Planning Zones are not public;



- Previous plants used reference accident for their planning, whereas now operators must take a more holistic view of accidents to generate risk frameworks.

The Forum raised additional points as part of this item:

- The member enquired about the rules governing access to public information generated by the nuclear site operators. BEIS note that information in the public domain will be a plan produced by a local public authority.
- The importance of transport was raised with the Forum enquiring about the level of planning that is required for emergency in-transit. BEIS respond that transport regulation was not previously accounted for and there is no legal requirement to publish emergency planning for transport. This is to change with the new Statutory Instrument on the Transport of Radioactive Material. The duty is on the ONR for radiation incidents on transport routes.
- The Forum expressed concerns about emergency planning; noting that the public should be involved in an emergency exercise. BEIS cannot comment on participation of the public in emergency planning.
- The Forum enquire if BEIS considered the work of IRSN and ASN (French regulator) on emergency planning following Chernobyl and Fukushima. Specifically, the work looked at comparing the emergency plans with the reality of human behaviour following an incident. BEIS are aware of work looking at the differences between emergency plans and reality. Planning is initiator neutral and aims to understand threats generally.

Co-Chair AB then closed the item and all items for the day.

## **5.1 Summary**

BEIS officials presented policy developments on Emergency Planning Regulations, detailing key changes to regulations. The forum raised several queries about the scope of the new regulations, including the transport of radioactive material.





## **6 AOB**

Before closing the meeting, the Co-chairs opened the meeting to Any Other Business from the Forum members. Points raised included:

- General concern that volunteerism is incompatible with the planning process for radioactive waste management. In addition, siting of a GDF in a National Park or designated area was raised by the Forum. BEIS noted that siting is intended to be carried out using the planning process which is lawful.
- The use of power lines in the energy sector for connections to other grids was raised by MT. The member noted the need to understand the planning process for energy infrastructure (i.e. substations, hydrogen storage, underground cabling, energy transport infrastructure) and enquired on the appropriate BEIS department that may have the information.

### **BEIS Action: Provide MT with contact details on energy infrastructure**

- A Forum member asked for paper copies of materials to be provided at the next Forum meeting. Members will be prompted to request ahead of the next meeting if they wish to be provided with paper copies.

## **7 Actions from the Forum Meeting**

- **BEIS Action: Check on concerns submitted by the Forum referencing drone attacks on nuclear installations**
- **BEIS Action: Provide information on the consultancies used by BEIS for alternative funding mechanisms**
- **BEIS Action: Continue discussions with RB and PW on potential counterparts for JFF.**
- **BEIS Action: Understand if radioisotopes are tested at Francis Crick**
- **BEIS Action: Inform EDF of the concerns raised and that no responses have been received by Forum members on requests for information**
- **BEIS Action: Provide MT with details/publications on energy infrastructure**





## 8 Attendees

Attendees	Organisation
<b>NGOS</b>	
Peter Banks	Blackwater Against New Nuclear Group
Varrie Blowers	Blackwater Against New Nuclear Group
Andy Blowers	Blackwater Against New Nuclear Group
Rod Donington-Smith	Cumbria Trust
Ian Ralls	Friends of the Earth
Ruth Balogh	West Cumbria North Lakes - Friends of the Earth
Tor Justad	Highlands Against Nuclear Transport
Richard Bramhall	Low Level Radiation Campaign
Neil Crumpton	People Against Wylfa B
Jo Brown	Parents Concerned About Hinkley
Sue Aubrey	Stop Hinkley
Allan Jeffery	Stop Hinkley
Mike Taylor	Together Against Sizewell C
Peter Wilkinson	Together Against Sizewell C
<b>External Attendees</b>	
Caroline Richards	Environment Agency
Alan McGoff	Environment Agency
Daniel Jones	Office for Nuclear Regulation
Rachel Grant	Office for Nuclear Regulation
Janet Wilson	Committee on Radioactive Waste Management
<b>BEIS Officials</b>	
Samuel Ha	BEIS
Daisy Ray	BEIS
Ian Cullen	BEIS
Helen Shirley-Quirk	BEIS
Chris Bowbrick	BEIS
Graham Webber	BEIS
Hannah Fenwick	BEIS
Kathryn Yates	BEIS
Craig Lester	BEIS
Stephen Speed	BEIS
Phil Hicken	BEIS