



BEIS Nuclear NGO Forum Minutes

Wednesday 4 December 2019

12:30 – 15:40

**Stephenson Room, Broadway House, Tothill Street, Westminster,
London, SW1H 9NQ**

1. Introductions

Co-Chairs of the Forum Stephen Speed (SS; Director, Nuclear, BEIS) and Professor Andrew Blowers (AB; Blackwater Against New Nuclear Group) opened the meeting welcoming attendees. It was noted the Forum had a new secretariat, Shah Bhatti and Sean Rooney.

SS noted due to the pre-election period the Minister for Business and Industry (Nadhim Zahawi) was unable to attend.

Actions from the previous meeting (26 June 2019) were reviewed:

- The minutes from the previous forum were sent to all NGO members. Members were advised to get in touch with the new secretariat if they had any issues.
- Discussions on Joint Fact Finding on Low-Level Radiation - BEIS have had discussions with Richard Bramhall regarding this matter. It was noted BEIS can only aim to facilitate the Committee on Medical Aspects of Radiation in the Environment (COMARE) rather than undertake the work through a Joint Fact Finding as this will interfere with the work COMARE do.
- Radioactive Waste Management questions - Members should have received a reply from Ann McCall regarding questions raised at the last Forum. Copies were also made available to attendees at the forum. Members were advised if they had any further questions to contact Simon Napper or Ann McCall.
- Reply to Neil Crumpton on scenario analysis - BEIS have reviewed Neil's analysis and will reply shortly. Neil suggested a reply was not needed at this stage.

2. BEIS Update

SS made the forum aware of the current major party's manifesto stances on nuclear. He advised members to draw their own conclusions about future attitudes to nuclear.

SS provided an update to the Forum on BEIS matters from his side of the Nuclear Directorate:

- **New Nuclear, Sector Deal, International and domestic engagement:**
 - Progress at Hinkley Point C continued, with over 4000 people now working on the site. It also included 500 apprentices, meaning EDF Energy's target of 1000 apprentices was within grasp. Any construction risks were entirely the responsibility of EDF Energy and their investment partners and would not fall on taxpayers or consumers. BEIS meet with EDF Energy quarterly for assurance and governance.



- Good progress continues on the nuclear sector deal with the establishment of programme management office (PMO) at Nuclear Industries Association (NIA).
- On 22 July the Nuclear Skills Strategy Group published their Equality, Diversity and Inclusion (ED&I) Strategy an important step towards delivering on the deal's commitment to 40% women in nuclear by 2030.
- Also, on 22 July a Rolls-Royce led consortium SMR proposal was accepted in Wave 3 of the Industrial Strategy Challenger fund. BEIS made an initial award of £18m.
- Minister Zahawi gave a well-received speech at the IAEA General Conference.
- Successful engagement at G7 Nuclear Skills Strategy Group in Paris (November), NEA Steering Committee in Paris (November), IFNEC Steering Group in Washington (November), UK-France Civil Nuclear Partnership Forum in Paris (November).
- UK-Ireland and UK-Japan civil nuclear dialogues held at BEIS during November. The Japanese talks focused on new build, decommissioning and waste management and post-Euratom world.
- Most recent cycle of quarterly stakeholder forums in Somerset, Suffolk and Anglesey have taken place over the last few weeks. Focus of Somerset and Suffolk forums in particular is on the long-term legacies of the projects, particularly in terms of skills, high quality employment, infrastructure.
- **Advanced Nuclear Technologies**
 - The framework for Small and Advanced nuclear set out in the Nuclear Sector Deal continues.
 - Craig Lester (CL) to provide a more detailed update on ANT in this Forum.
- **Regulated Asset Base (RAB) model**
 - BEIS continue to review the viability of a RAB model as a sustainable funding model based on private finance for future nuclear projects, to assess whether it can offer value for money for consumers and taxpayers.
 - Erin Coughlan (EC) to provide a more comprehensive update in this Forum.
- **Energy White Paper**
 - The Energy White Paper was pre-election period bound. The Government after the general election will choose whether to publish it.

Helen Shirley-Quirk (HSQ) provided an update from her side of the BEIS Nuclear Directorate:

- **Civil Nuclear Security and Safety**
 - The UK hosted an International Atomic Energy Agency (IAEA) peer review mission from 14-25 October 2019. The Integrated Regulatory Review Service (IRRS) mission assessed the whole of the UK's regulatory framework for nuclear and radiological safety. The review covered the work of 15 regulatory bodies and 11 Government Departments.



- It is ultimately Ministers decision to publish the IAEA reports. New regulations for emergency civil nuclear preparedness and implantation is continuing, work underway on a local level.

In response to a question it was noted that the Nuclear Sector deal PMO was unlikely to be covered by FOI as it was housed within the private trade associate, NIA. NIA and the Government are working closely together.

Alison Downes (AD) clarified Labour's stance on Nuclear and was surprised about Hinkley progress due to announcements of cost overspend and time over run. It was noted this was for EDF Energy to correspond on as BEIS' role was limited to assuring the project. Details can be found on the EDF Energy website.

A question was raised on whether the Office for Nuclear Regulation (ONR) would intervene regarding EDF Energy's plans to introduce a 1km emergency planning zone. It was stated ONR's role is as an overseer and it is compliant with IAEA, consultations occurred with the operator and local authorities.

There was a question about the 'shuttering' of Magnox stations assumed to mean care and maintenance of the stations, which had been the plan during the Cavendish Flour partnership. It was clarified that discussions on this were ongoing within the Nuclear Decommissioning Authority (NDA). Policy would not be forced on the NDA by BEIS.

NGO members stated BEIS officials should visit local authorities and interact more often with stakeholders. BEIS officials stressed the importance of not duplicating the forum but were willing to do more where possible.

3. NGO Forum Review

Both Co-Chairs began by outlining the importance of resetting the forum's aim and purpose. The last few meetings had not been effective with frustrations on both sides.

SS stated BEIS were committed to listening to a wide range of stakeholders which is a crucial part of policy formulation. BEIS want to do that in a constructive way but also need to balance member's expectations on what can be achieved at the forum.

The new updated Terms of Reference demonstrate the need for respect for differing views and attempts to define more clearly the impartiality of civil servants and outline the inability to negotiate policy at the forum.

AB stressed the need to have an open discussion on how to proceed. He felt some things worked well but there needed to be more focus on: what is done; how it's done; and the purpose. It is hoped to continue as far as possible in an atmosphere for consensus and not confrontation.

AB also mentioned NGOs have largely set the agenda and provided papers which officials have responded to. On their part BEIS have not provided presentations for NGOs to respond to. A full engagement requires both NGOs and BEIS officials to provide papers for basis of discussion.



The discussion was opened to the floor for members' views.

Members raised questions on Ministerial attendance and the need for Ministers to have meaningful discussions and not to read from a briefing pack.

SS responded by saying it is always BEIS intention to get Ministerial attendance.

The forum suggested a culture of openness and praised BEIS for their open and inclusive engagement on matters of emergency planning. They sought more engagement in a similar spirit while recognising that they didn't expect to agree with them all of the time. The important point was the need to be listened to and respected.

Decision – The new Terms of Reference were agreed.

4. Geological Disposal Facility, National Policy Statement

Richard Allen (RA) began by presenting the slides on the GDF National Policy Statement (NPS). He stated for future queries relating to siting developments members should contact the Radioactive Waste Management (RWM) team (contact details are gdfenquiries@nda.gov.uk).

The main points stated:

- Geological Disposal is the Government's preferred solution for Higher Activity Radioactive Waste.
- Boreholes to characterise rock at least 150m deep.
- The GDF is expected to be 200m-1km underground.
- On 17 October 2019, the GDF NPS was designated. The Post Adoption Statement of the Appraisal of Sustainability and the Habitats Regulations Assessment of the NPS were also published. This concluded the specific work on the NPS by BEIS until a Development Consent Order (DCO) application is brought forward.
- A number of changes/ clarifications were made to the NPS that sought to address the comments received during consultation (including from members of the forum) and parliamentary scrutiny. This included: clarity that the DCO applications are expected to come in two phases with the first phase just covering boreholes, explicit requirement for developer to detail the inventory for disposal and better explanation of the regulatory framework.
- For further updates related to GDF siting the forum members were encouraged to subscribe to the RWM mailing list.

AB questioned if the ethical issue about policy of new build had been considered and that the waste from new nuclear stations is part of RWM's commitment?

RA confirmed that new build waste is part of the NPS, and that the need case for New Nuclear had been clarified to explain that although the 2006 Committee on Radioactive Waste Management (CoRWM) recommendation didn't explicitly cover new build waste, subsequent policy work and study work by CoRWM and RWM satisfied the need case for new build. CoRWM were consulted when these updates were made and were happy with the changes made.



The NGOs questioned if it was possible for EDF Energy to submit a planning permission (development consent order) against the NPS to develop a borehole to deal with their own waste. This is technically possible because the NPS is not specific to RWM. However, this was highly unlikely as EDF already provide payments to Government to manage the waste for them and so it would not be financially credible.

The NGOs questioned if the NPS had had sufficient opportunity for Parliamentary scrutiny given the domination of Brexit pushing debates off the timetable. Umran Nazir noted that the NPS had been debated by a Commons Select Committee, including an oral evidence session in which the BEIS Minister had responded to questions from MPs, and by the relevant Lords Select Committee and through that process had been deposited in Parliament for a long time, allowing MPs to scrutinise it. Both Select Committees had also produced a report with recommendations.

The NGOs questioned whether the taxpayer may end up paying for the GDF costs associated with waste from New Nuclear stations rather than the companies producing the waste. However, by law all new build developers need to establish a fund for decommissioning which includes an appropriate share of GDF costs. Contribution by companies will be proportionate to overall costs.

5. New Nuclear Financing Consultation on a Regulated Asset Base (RAB) Model

Erin Coghlan (EC) presented background information on the RAB model and its need to meet Government targets and provide better value for money for new nuclear builds.

The main points summarised RAB's potential to:

- Share risks between consumers, taxpayers and investors, so that it can attract private capital to fully finance a project.
- Lower the cost of capital, thereby reducing cost to consumers, by limiting and targeting investor risk.
- Ensure investors are incentivised to manage risks within their control.
- Consultation on the rationale for a nuclear RAB model and high-level design principles and components for a nuclear RAB model included the:
 - Economic Regulatory Regime (ERR);
 - Government Support Package (GSP);
 - Revenue Channel; and
 - Project Assessment process including potential risk sharing arrangements.

EC clarified BEIS are awaiting the new Government to direct RAB's future.

The Forum members outlined challenges with the policy. They questioned why taxpayers should take on risks that companies such as EDF Energy know of, hoping that Ministers will be made aware of other options available to them, not just RAB.

The current financial reporting of EDF Energy in France was noted, questioning how confident EDF Energy can be about building Sizewell C when the price of wind farms is more economically viable. This is something BEIS would consider important, when deciding how to assess the value for money of a RAB project.



6. Advanced Nuclear Technologies update

Craig Lester (CL) began by briefly summarising electricity demand increasing by 2050 and drivers for this, as well as the push for decarbonisation.

CL outlined the terminology used by HMG, and the difference between Small Modular Reactors (SMRs) and Advanced Modular Reactors (AMRs).

On SMRs, CL described the Low-Cost Nuclear Challenge, proposed by a consortium led by Rolls Royce which aims to develop a Small Modular Reactor by 2030s. Initial £36 million invested (HMG grant plus consortium funding). Each 440 MWe SMR is capable of powering 750,000 homes.

CL noted that the Rolls Royce-designed SMR aims to have a reduced concrete pour and less spoil removed from the site. Carbon footprint is therefore potentially a lot smaller. Details are available online on technology vendors websites.

NGO forum members said that the carbon footprint of projects is contested, and impacts depend on how you look at it.

CL also discussed the potential of AMRs to decarbonise our economy beyond electricity generation by describing the various and other possibilities claimed by AMR designers including use of high temperature heat for industrial processes such as hydrogen production.

It was questioned if the waste from AMRs and SMRs would be accommodated by a GDF. CL said that the fuel/waste from SMRs (which were similar in technology to large reactors) would be familiar. Waste from AMRs will depend on the reactor design and fuel and is still being evaluated by HMG as these are in very early stages of development. However, an AMR would not be licensable if its fuel and waste cycle had not been approved by regulators.

David Lowry asked whether some of the feasibility and development reports for AMRs could be shared with the NGOs. CL said he would liaise with Science and Innovation colleagues to consider this and get back to the NGOs, noting that the AMR competition was not yet resolved.

CL stated BEIS try to speak at a variety of conferences and are constantly open to dialogue with interested parties on SMRs and AMRs.

Action – Craig Lester to speak to the Science and Innovation for Climate and Energy team in BEIS about making the AMR F&D reports available to members of the NGO forum.

7. AOB

The Co-Chairs ended by thanking all presenters and making all aware that the next meeting of the forum would take place after the General Election. They welcomed the collegiate nature of the discussion and committed to maintain this. The strong desire for Ministerial attendance was well made with a commitment by BEIS to try to make this happen.

A case for in-depth discussion about site security is there. It would also be helpful to do workshops on public perception to allow BEIS to work closely with communities.

Review of Actions

Action – Craig Lester to speak to the Science and Innovation for Climate and Energy team in BEIS about making the AMR F&D reports available to members of the NGO forum.

8. Attendees

Attendees	Organisation
NGOs	
Andrew Blowers	Co-Chair of NGO Forum Blackwater Against New Nuclear Group
Neil Crumpton	People Against Wylfa B
Paul Collins	Theberton and Eastbridge Action Group on Sizewell
Sean Morris	Nuclear Free Local Authorities
David Lowry	Nuclear Waste Advisory Associates
Ian Ralls	Friends of the Earth
Simon Napper	Radioactive Waste Management
Peter Banks	Blackwater Against New Nuclear Group
Alison Downes	Theberton and Eastbridge Action Group on Sizewell
Mike Taylor	Together Against Sizewell C (TASC)
Chris Wilson	Together Against Sizewell C (TASC)
Jo Brown	Parents Concerned About Hinkley (PCAH)
Rod Donington-Smith	Cumbria Trust
Jill Sutcliffe	Low Level Radiation and Health Conference
Richard Bramhall	Low Level Radiation Campaign
External Attendees	
Caroline Richards	Environment Agency



Alan McGoff	Environment Agency
Jo DeBank	Office for Nuclear Regulation
Simon Napper	Radioactive Waste Management Stakeholder Engagement Adviser
John McNamara	Nuclear Decommissioning Authority (NDA)
BEIS Officials	
Stephen Speed	Co-Chair of NGO Forum BEIS, Director, Nuclear Directorate
Helen Shirley-Quirk	BEIS, Director, Nuclear Directorate
Chris Bowbrick	BEIS, Deputy Director, Nuclear Energy Generation and International
Umran Nazir	BEIS, Deputy Director, Decommissioning, Radioactive Materials and Geological Disposal
Craig Lester	BEIS, Deputy Director, Advanced Nuclear Innovation Team
Erin Coghlan	BEIS, Deputy Director, Nuclear Projects, New Nuclear Financing
Graham Webber	BEIS, Deputy Director, Nuclear Resilience & Non-Proliferation
Zilla Howell	BEIS, Deputy Director, Civil Nuclear Security & Safety
Richard Allen	BEIS, Senior Policy Advisor on the Nuclear Decommissioning Authority sponsorship team
Sean Rooney	BEIS, NGO Secretariat
Shah Bhatti	BEIS, NGO Secretariat
Matt Grozier	BEIS, Note Taker
Alex Cunningham	BEIS, Note Taker