

Regulatory Interface Management (RIM) Group Meeting

16 January 2020 1030 - 1400

Courtyard Hotel, Milton Park, Oxfordshire

Minutes

Attendees

- Department for Business, Energy and Industrial Strategy (BEIS)
- Planning Inspectorate (PI)
- Marine Management Organisation (MMO)
- Environment Agency (EA)
- Office for Nuclear Regulation (ONR) (by telephone)
- Radioactive Waste Management Limited (RWM, Chair and Secretary)

1. Introduction and opening remarks

The Chair welcomed attendees and mentioned that MMO is attending the RIM Group meeting for the first time.

Apologies had been received from Defra, Natural Resources Wales and the Scottish Environment Protection Agency.

2. Minutes and actions from the previous meeting

The draft minutes of the previous meeting (18 September 2019) were accepted as a true record subject to clarification of a statement in the Planning Inspectorate update. The minutes will be published on the RIM Group webpage.

Actions

- | | |
|------------|---|
| RIM2018/02 | RIM Group Chair will update the RIM group Terms of Reference (TOR). This should include reference to all levels of engagement between RWM and the RIM group members clarifying the hierarchical nature for engagement. The TOR will be circulated ahead of the next RIM group meeting. Open. |
| RIM2019/11 | Determine process for engaging with regulators on progress of discussions with interested parties. Closed. |
| RIM2019/12 | Communicate to RIM group members the timescales for when RWM will be in a position to update regulators on progress on work to trial the development and use of a site descriptive model. Open. |

3. BEIS/General Policy update

The process for transferring the GDF programme governance from BEIS to NDA has been completed. The role of Senior Responsible Owner now sits in the NDA and an individual has been appointed to hold this role. BEIS will continue to be part of the Geological Disposal Programme Board (GDPB); however the NDA Senior Responsible Owner will be responsible for driving the work of the GDPB.

The review of the Radioactive Waste policy paper is expected to continue. Subject to Ministerial approval it is expected that the updated paper will be the overarching policy paper for radioactive waste management and decommissioning. It is currently anticipated that the policy update will be completed by the end of 2020.

No legal challenges to the National Policy Statement on Geological Disposal Infrastructure were received within the challenge period.

Attendees discussed assumptions for the first emplacement of waste in the GDF. RWM stated that given that geological disposal depends on progressing with communities; there are a number of scenarios which are being developed to help RWM plan.

4. RWM update

The NDA is becoming a more strategic authority, drawing on the benefits of closer working with all parts of the NDA and its subsidiaries. A positive development has been the increasing prominence of GDF across the NDA Estate. The NDA Chief Executive is reviewing the current model of the NDA and its subsidiaries.

Post meeting note: On the 4th February NDA announced it would bring its transport and logistics expertise together into a single division. More on this announcement can be found here: <https://www.gov.uk/government/news/the-nda-will-bring-its-transport-and-logistics-expertise-together>

The NDA has also encouraged innovation across several fronts to overcome future challenges in decommissioning and waste packaging.

RWM's most recent application for a budget increase was accepted by government. The increase will allow RWM to prepare the organisation for the next phase of the programme.

The previous RIM Group meeting mentioned that RWM's Managing Director will be stepping down in March 2020. Recruitment is ongoing to determine a replacement.

Post meeting note: On the 17th January 2020, Karen Wheeler CBE was announced as the new Chief Executive of RWM, more on this appointment can be found here: <https://www.gov.uk/government/news/karen-wheeler-cbe-announced-as-new-chief-executive-of-rwm%20>

There have been further changes in RWM's Executive Committee. An Interim Transformation director has been appointed to drive RWM's transformation into a major programme delivery organisation. Additionally, the director for GDF Siting and Engagement resigned from their position, and an Acting director has been appointed in this role.

Organisational headcount is currently 180 staff (including 20 interims). The short term forecast is for 195 staff to be in place by the end of the current financial year.

The full Business Case for Tranche 2 of the GDF Programme has been approved. The RWM Board has approved the approach to be taken for the development of the Business case for Tranche 3 which is related to site characterisation and improving the capability of the organisation to deliver this.

RWM is aiming to communicate plans, strategies and assumptions for the longer term so that other stakeholders can plan accordingly. The RIM Group is one of the forums for RWM to disseminate this type of information to the relevant stakeholders.

On the plans for siting, RWM has been raising awareness and engaging with stakeholders with a view to establishing Working Groups when interested parties come forward. Determining which permits and consents RWM will require will be dependent on site-specific factors and so cannot be definitively determined until potential sites are known.

Action RIM2019/13 RWM will share with RIM Group members its assumptions of the permits and consents that may be applicable once the location for GDF is determined.

RWM has continued to develop relationships with other organisations. Recently, RWM presented at the Marine Management Organisation on the background of GDF and current progress. Similar engagement with Defra is expected in the near future.

RWM is making progress on developing its approach to and understanding of the implications of the Groundwater Daughter Directive. There has been initial engagement on this with Defra and the EA.

Other developments include the demonstration of borehole sealing which has, until now, been at theoretical and lab-based stages. This will shortly progress to a field scale experimental phase using existing historic boreholes.

The Committee on Radioactive Waste Management (CoRWM) is now at full membership after the appointment of several new members. CoRWM will be visiting RWM on the 20th February to get an overview of RWM's progress.

RWM discussed its work on its communication strategy. The objective of RWM's strategic communications is to establish a trusted public profile and strengthen key relationships to support RWM's mission on both waste management and the GDF. A major part of this work is to understand the different stakeholders that exist in the country and in various sectors. The work also involves understanding how the organisations may want to be involved in the geological disposal programme and be made aware of progress.

Representatives from the Planning Inspectorate and the Marine Management Organisation highlighted that there may be opportunities to update statutory consultees that attend their periodic meetings (usually held annually) and for RWM to provide them with an overview of what it is aiming to achieve and highlight the progress being made.

Action RIM2019/14 RIM Group members to advise on how/if RWM could attend their engagements with external stakeholders

(mainly statutory consultees) for opportunities to raise awareness on the GDF.

As part of awareness raising for GDF among members of parliament, RWM is planning to hold a parliamentary event in Westminster before the end of the financial year 2019/20.

5. Planning Inspectorate update

The PI is currently undergoing phase two of an organisational change programme. This phase does not affect infrastructure work. The new structure should be in place by the 1st April 2020.

The PI is currently handling 30 live applications, each at different stages within the DCO application process.

There is a plan to improve streamlining of the process to make it easier for those involved to submit documents. The website is being updated to allow electronic submissions of representations.

6. Marine Management Organisation update

This was the first occasion that the MMO had attended the RIM Group meeting. The MMO representative provided an overview of the organisation and its responsibilities.

The organisation is about 10 years old and is responsible for preparing marine plans in England. The MMO is involved in several sectors and their structure reflects this, for example there are sector leads for Renewable Energy, Ports & Marinas and Nuclear New Build among others.

The MMO deals with an average of 500-600 applications in a year. A majority of activities that are overseen are planned for the seabed rather than under the seabed. The MMO representative talked about regional marine plans.

Action RIM2019/15 MMO will present at a future RIM Group meeting to provide an overview of the organisation.

7. ONR update

Work is ongoing to produce an updated interpretation of 'bulk quantities' in the context of licensing both storage and disposal. The plan is for a consultation to take place by the end of the financial year 2019/20. An interim position statement is available on the ONR website.

The CoRWM chair will meet the ONR chair before the end of the financial year.

The ONR has published a draft 2025 strategy; this is open for consultation. RIM Group members can provide feedback via the ONR website.

8. EA update

The EA representative provided an update of the recent Integrated Regulatory Review Service (IRRS) mission which took place in October 2019. The IRRS mission report is awaiting ministry approval ahead of publication.

The EA has no organisational changes planned. There is an ongoing review of the corporate action plan. As a result, there will be increasing prioritisation of sustainability within the organisation and the EA encourages other organisations it regulates to also prioritise sustainability by determining Sustainable Development goals and implementing measures related to the Climate Emergency. The EA as an organisation is aiming to be net zero by 2030.

In October 2019, the EA and ONR published a joint annual (2018/19) report titled '*Regulatory scrutiny and engagement for geological disposal*' that summarises their work relating to the geological disposal of radioactive waste. Among the highlights were:

- RWM significantly improved the generic Disposal system Safety Case
- No fundamental regulatory issues that would prevent RWM from developing a fully scoped safety case in the future. However, there were a number of areas that RWM will need to improve when it does.
- Non-radioactive contaminants have been included in the inventory
- Advice and scrutiny has been initiated on RWM's work on planning and preparation for permitting

The EA is updating the Guidance on Requirements for Authorisation (GRA). The guidance sets out the framework within which the EA regulates geological disposal. The aim is to complete the review and consultation by the end of 2020. The GRA for near-surface disposal is also being looked at in the same time frame. The existing GRA documents for geological and near-surface disposal are suitable for regulation currently, however it is intended to update them in line with the Guidance on the Requirements for Release from Radioactive Substances Regulation (GRR).

9. Other Business

None

10. Date of Next Meeting

The next RIM Group meeting would be on the 13th of May.

Post meeting note: This planned face to face meeting was subsequently amended to a virtual meeting on the 29th June due to the Covid-19 epidemic.

Summary of ongoing actions

| | | |
|------------|-----------------------|--|
| RIM2018/02 | RIM Group Chair | RIM Group Chair will update the RIM group Terms of Reference (TOR). This should include reference to all levels of engagement between RWM and the RIM group members clarifying the hierarchical nature for engagement. The TOR will be circulated ahead of the next RIM group meeting. |
| RIM2019/11 | RWM Representative | Determine process for engaging with regulators on progress of discussions with interested parties. |
| RIM2019/12 | RWM Representative | Communicate to RIM group members the timescales for when RWM will be in a position to update regulators on progress on work to trial the development and use of a site descriptive model. |
| RIM2019/13 | RWM Representative | RWM will share with RIM Group members its assumptions of the permits and consents that may be applicable once the location for GDF is determined. |
| RIM2019/14 | RIM Group | RIM Group members to advise on how/if RWM could attend their engagements with external stakeholders (mainly statutory consultees) for opportunities to raise awareness on the GDF. |
| RIM2019/15 | MMO Representative | MMO will present at a future RIM Group meeting to provide an overview of the organisation. |