

LETTER TO DECC ON THE ‘JUSTIFICATION’ OF NEW NUCLEAR POWER REACTORS IN THE UK, MARCH 5 2009

We write to express our concern about the way it is proposed to make a decision on whether or not new nuclear reactors are ‘justified’ in the UK.

The Justification process is a high level assessment concerning whether the benefits of new nuclear build outweigh the potential detriments. Once the Justification decision has been taken it will be difficult if not impossible to re-open the major issues of policy in relation to particular nuclear practices wherever they are proposed to be sited.

Since Justification is a key regulatory process and part of the international system for attempting to ensure the safety of nuclear power, it must be carried out in a way which is thorough, transparent, neutral and independent. However, the crowded schedule for all the processes for new nuclear build, as given in Government documents, shows that co-dependent processes are either ‘stacking up’ or taking place ‘out of sync’ – and this, in turn, results in an inordinately hurried decision-making timeline. For example, full information on how waste and spent fuel from new build may be managed or the impact of discharges will not be fully assessed until after the reactor Generic Design Assessment is finalised. In the current DECC time-line, that is more than a year after the decision on Justification.

This hurried and unsynchronised timeline does not allow for full discussion on all the relevant issues on new nuclear build in a manner which allows for proper consultation and decision making based on all relevant information. This is contrary to good process on public consultation. In relation to this we note that, for such a significant process, the Justification timeline is short, and that examination of the responses to the Justification consultation will take place in closed session.

We do not believe it is appropriate for the Secretary of State for Energy and Climate Change to be the Justifying Authority as he, and DECC, have already expressed their clear support for new nuclear reactors. Given that Justification, once finalised, may foreclose on any future discussion on issues crucial to nuclear power, it is vital that this process is opened up in order to allow for meaningful and realistic examination of evidence a public forum.

Because the Justification of new nuclear power in the UK represents a key issue for trust in governance concerning energy policy and the control of radiation risk, we believe the Government should hold an independent inquiry, as allowed for under the regulations governing Justification: *The Justification of Practices Involving Ionising Radiation Regulations 2004 (No. 1769), Regulation 17.*

ON BEHALF OF THE NUCLEAR CONSULTATION GROUP