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#### **1. National Policy Statements – re-launched consultation**

The Department for Energy and Climate Change (DECC) launched a second round of consultation on the six energy National Policy Statements (NPSs) on 18<sup>th</sup> October. (1) The consultation will run until 24 January 2011. No2nuclearpower spotted the week before the consultation website had inadvertently become visible for a while and reported the two green field sites in Cumbria had been dropped. (2)

Each of the original draft NPSs were accompanied by an Appraisal of Sustainability (AoS). These were supposed to have been written to fulfil the Government’s obligations to publish an ‘*environmental report*’ under the European Strategic Environmental Assessment (SEA) Directive and SEA Regulations. The original AoSs made a comparison between implementing the same policies with and without an NPS. In other words, they failed to consider the effects of the policies proposed in them. Friends of the Earth made clear in a legal letter to Ed Miliband in January 2010 that this approach was not legal (3) and this seems to have been particularly influential on the decision to re-run the consultation. The AoSs have now been rewritten to answer the question “what difference would it make to build a new generation of energy infrastructure in accordance with the NPSs?”, and more alternatives have also been considered. (4)

It will be interesting to see whether any extra consultation of local authorities takes place this time to deal with another problem the original drafts suffered from which was highlighted by *Planning* magazine. (5) The Planning Act (2008) imposes strict statutory consultation requirements with ministers obliged to give councils an opportunity to comment on publicity requirements for proposed

projects in their vicinity. Adjoining authorities must also be consulted. This means the list of consultees is lengthy – in the case of nuclear sites it includes 110 authorities. Through a series of Freedom of Information requests *Planning* magazine ascertained that no more than 20 authorities had been involved in discussions.

Rather confusingly the revised draft NPSs have been laid before Parliament for any further scrutiny that Parliament may decide to undertake, but the ‘Relevant Period’ for that scrutiny ends on 31 January 2011 even though the public consultation finishes a week earlier. According to the standing orders of the House of Commons, the government must be provided with any reports of select committees 39 days before that date, which in this case is 22<sup>nd</sup> December 2010. The Government says it intends to present the finalised statements to Parliament for ratification next spring. (6)

A summary report on the Government’s first consultation on the draft NPSs on energy, compiled by the Office for Public Management (OPM) on behalf of DECC, is available on the consultation website. (7) So too is a 300 page Government response to the original consultation. (8) There is a separate response document to the recommendations made by the Energy and Climate Change Committee and the House of Lords. (9) This has addressed each of the Commons select committee’s thirty recommendations and has responded to what it considers were the main issues raised in the Grand Committee debates in the House of Lords, and also the five motions that were debated on the floor of the House albeit withdrawn following the debate.

The response to the Energy and Climate Change Committee’s recommendation No.17 says the NPS has been revised to indicate the Government no longer expects spent fuel to be stored on reactor sites for as long as 160 years, although it says a Geological Disposal Facility will not be able to accept new build waste until 2130, so there will still be at least 110 years of storage. The report also states that the geological disposal facility is likely to be a project that comes under the Planning Act.

On the Committee’s recommendation that on-site storage should not be ruled out from the Infrastructure Planning Commission’s (IPC’s) deliberations, the Government draws a distinction between the principle that waste can be managed and disposed of in a satisfactory manner, which it says is not a point that the IPC should consider, and the nature of the onsite facilities proposed for the management of radioactive waste. The Government agrees there are planning issues relating to this which it is appropriate for the IPC to consider, so it has amended Annex B of EN-6 to clarify the position.

For the Nuclear NPS (EN-6), consultees were asked whether they agreed that of eleven sites nominated as potential new nuclear power stations, ten were suitable and one (Dungeness) was not. The numbers of responses on each site were interesting: Kirksanton far outweighed all the others, with 1083 responses while the other site dropped – Braystones – only got 92. The main reasons that Kirksanton and Braystones were dropped from the list of nuclear sites were that they were considered not to be capable of development before 2025, but perhaps more importantly the need for power stations there was not considered to be enough to outweigh the effect on the Lake District National Park of building them. (10)

All the responses to the original consultation are available, but have been listed according to the name of the person who submitted them. So unless you know, for example, that the submission for Nuclear Waste Advisory Associates was made by Pete Roche, your chances of finding it are limited. (11) According to Planning Lawyers, Bircham, Dyson and Bell, the government is planning for legal challenges to be made to the adoption ('designation') of the energy NPSs, and is not expecting them to be finally in place until later next year. (12)

Three stakeholder consultation events will be taking place for this consultation, but only the first 100 who register for each event will be able to attend. The events will be held in Bristol on the 29th November, Manchester on the 30th November and London on the 2nd December. To register go to [https://www.energy-npsconsultation.decc.gov.uk/events/consultation\\_events](https://www.energy-npsconsultation.decc.gov.uk/events/consultation_events)

- (1) Planning for new energy infrastructure: Consultation on revised draft National Policy Statements for Energy Infrastructure, DECC October 2010.  
<https://www.energynpsconsultation.decc.gov.uk/docs/ConsultationDocument.pdf>  
Consultation website: <https://www.energynpsconsultation.decc.gov.uk/>
- (2) Nuclear Engineering International 13<sup>th</sup> October 2010  
<http://www.neimagazine.com/story.asp?sectionCode=132&storyCode=2057788>
- (3) National Policy Statements for Energy, Friends of the Earth Rights and Justice Centre, 18<sup>th</sup> January 2010 <http://data.energynpsconsultation.decc.gov.uk/documents/responses/1722.pdf>
- (4) Bircham, Dyson & Bell 18<sup>th</sup> October 2010 <http://www.bdb-law.co.uk/blog/177-second-national-policy-statement-consultation-launched>
- (5) See NuClear News No.15, February 2010.  
<http://www.no2nuclearpower.org.uk/nuclearnews/NuClearNewsNo15.pdf>
- (6) Ministerial Statement on Energy Policy, 18<sup>th</sup> October 2010.  
[http://www.decc.gov.uk/en/content/cms/news/en\\_statement/en\\_statement.aspx](http://www.decc.gov.uk/en/content/cms/news/en_statement/en_statement.aspx)
- (7) National Policy Statements for Energy Consultation, Summary Report, March 2010.  
[https://www.energynpsconsultation.decc.gov.uk/home/previous\\_consultation/opm\\_summary\\_report](https://www.energynpsconsultation.decc.gov.uk/home/previous_consultation/opm_summary_report)
- (8) The Government Response to the Consultation on the draft National Policy Statements for Energy Infrastructure, DECC, October 2010.  
<https://www.energynpsconsultation.decc.gov.uk/docs/GovernmentResponsetoConsultation-October2010.pdf>
- (9) The Government response to Parliamentary Scrutiny of the draft National Policy Statements on Energy Infrastructure, DECC, October 2010.  
<https://www.energynpsconsultation.decc.gov.uk/docs/GovernmentresponsetoParliamentaryScrutinyofdraftEnergyNPSs-October2010.pdf>
- (10) Bircham, Dyson & Bell 22<sup>nd</sup> October 2010 <http://www.bdb-law.co.uk/blog/179-analysis-original-consultation-and-revised-national-policy-statements>
- (11) See <http://data.energynpsconsultation.decc.gov.uk/documents/responses/1320.pdf>
- (12) Bircham, Dyson & Bell 15<sup>th</sup> October 2010 <http://www.bdb-law.co.uk/blog/176-consultation-revised-national-policy-statements-expected-monday>

## 2. Delay is the order of the day

The first commercial production of electricity at Flamanville in Normandy will not now take place before 2015, according to the daily newspaper Le Figaro. This means the reactor is more than three years behind schedule, rather than the previously reported two. (1)

In the UK the Government's plans are already behind schedule. A briefing paper prepared by the Office of Nuclear Development (OND) shows there has been "*some slippage of about six to nine months*" due to planning delays, the election and the long approval process for reactor designs.

Rebecca Seabury, an energy analyst at Inenco, said there were likely to be further hold-ups, and the spate of Government announcements on 18<sup>th</sup> October moves us no further forward because "*investors will still wait until the price of carbon reaches the required level to make their investment profitable.*" Andrew Horstead, a risk analyst for energy specialists Utilyx, was similarly sceptical: "*...it's unlikely we will see any new plants come on stream by 2020.*" (2)

Tory energy minister Charles Hendry attempted to reassure a nervous nuclear industry that a six month delay will not jeopardise plans for a new reactors. He admitted the industry will experience a "*period of uncertainty*" until the government publishes its long-awaited plans. But he insisted the UK remains "*probably one of the most exciting places in the world for new nuclear build.*" (3)

- (1) Bloomberg 27<sup>th</sup> October 2010 <http://www.bloomberg.com/news/2010-10-27/edf-sees-further-delays-at-flamanville-nuclear-reactor-le-figaro-says.html>
- (2) Telegraph 19th October 2010 <http://www.telegraph.co.uk/finance/newsbysector/energy/8071288/UKs-new-nuclear-power-stations-already-nine-months-late.html>
- (3) Lancashire Evening Post 7<sup>th</sup> October 2010 [http://www.lep.co.uk/news/lep-business/nuclear\\_plans\\_will\\_not\\_be\\_hit\\_by\\_delays\\_1\\_1890914](http://www.lep.co.uk/news/lep-business/nuclear_plans_will_not_be_hit_by_delays_1_1890914)

### 3. New Reactor Designs “Justified”

Simon Hughes MP, the Liberal Democrat spokesman for energy and climate change until the General Election, said in March: *“It would be completely unacceptable for the government to rush through new nuclear in its last days in office without a public inquiry.”* (1) He called for an inquiry so that the evidence on radiation and health and the German KiKK study (2) in particular could be examined in an open and transparent way. (3) He was talking at a meeting in Westminster organised to discuss the ‘Justification Process’, which is required under European Union regulations. The Government must analyse whether the potential benefits of a new type of nuclear facility outweigh the health implications. In short, this is a process whereby the Secretary of State for Energy and Climate Change assesses whether new reactors can be justified considering the health detriments versus the advantages.

The Government’s Committee on the Medical Aspects of Radiation in the Environment (COMARE) is currently undertaking a further review of the incidence of childhood cancer around nuclear power stations, with particular reference to the KiKK study but the outcome of this review keeps getting delayed – it was originally due early in 2010. (4) So you’d have thought the Liberal Democrats case for an inquiry had increased as a result of the failure of COMARE to report. However, in the bizarre world of UK coalition politics it was a Liberal Democrat Energy Secretary who announced that he had lain before the House draft statutory instruments containing his decisions that the generation of electricity from AP1000 and the EPR reactors is justified.

Chris Huhne published documents which set out how he considered responses to the public consultations and how he assessed the net benefit of the classes or types of practice against the radiological health detriment they may cause. He claimed, without the benefit of advice from COMARE, that the radiological detriment to health from these nuclear reactor designs and their associated waste facilities will be low and effectively controlled by the UK’s robust and effective regulators. He also concluded that interested parties have been provided with sufficient opportunity to make their views known and that the draft statutory instruments containing the decisions will be debated in both Houses of Parliament so holding an inquiry is unnecessary. (5)

The Government published a specific document on his decision not to hold a public inquiry. (6) This doesn’t mention COMARE once. The document simply argues the main reason for holding an inquiry or other hearing would be to aid the effectiveness of the Secretary of State’s decision-making by investigating more thoroughly any issues which had not been adequately addressed through the process of public consultation. Since the consultation process has been sufficient to identify the information he needs, he does not consider it necessary to hold an inquiry.

The Regulatory Justification Decision Document for the AP1000 says:

*“COMARE is currently undertaking a further review of the incidence of childhood cancer around nuclear power stations, with particular reference to the KiKK study and COMARE’s tenth and eleventh reports. This will be published as COMARE’s fourteenth report later in 2010. COMARE is also keeping the incidence of childhood leukaemia and other cancers in the vicinity of Sellafield and Dounreay under surveillance and periodic review.”* (para 6.143)

Para 6.147 concludes:

*“The Secretary of State is satisfied that the best evidence suggests that no appreciable linkage between nuclear power stations and a higher incidence of cancer has been demonstrated.”* (7)

The research from Germany confirms there is a correlation between the distance of the home from nuclear power stations and the incidence of childhood cancer. (8) This finding has been accepted by the German government. This phenomenon demands investigation, so that the cause can be established, yet the UK Secretary of State has decided building new reactors is justified before

hearing what his own advisors have to say about it. He should be taking a precautionary approach which means leaving nuclear power out of the future energy mix with any further electricity capacity supplied by renewable energy.

- (1) Utility Week 11<sup>th</sup> March 2010 <http://www.utilityweek.co.uk/news/uk/electricity/politicians-and-academics-call.php>
- (2) New Statesman 7th April 2010 <http://www.newstatesman.com/blogs/the-staggers/2010/04/nuclear-power-lynas-climate>
- (3) See Infant Leukaemias near Nuclear Power Stations by Dr Ian Fairlie, CND Briefing, January 2010. [http://www.cnduk.org/images/stories/briefings/nuclear\\_power/ian\\_fairlie\\_kikk\\_cancer\\_increase\\_summary.pdf](http://www.cnduk.org/images/stories/briefings/nuclear_power/ian_fairlie_kikk_cancer_increase_summary.pdf)
- (4) [http://www.comare.org.uk/comare\\_work.htm](http://www.comare.org.uk/comare_work.htm)
- (5) Ministerial Statement on Energy Policy 18<sup>th</sup> October 2010 [http://www.decc.gov.uk/en/content/cms/news/en\\_statement/en\\_statement.aspx](http://www.decc.gov.uk/en/content/cms/news/en_statement/en_statement.aspx)
- (6) <http://www.decc.gov.uk/assets/decc/What%20we%20do/UK%20energy%20supply/Energy%20mix/Nuclear/newnuclear/664-public-inquiry-new-reactor-design.pdf>
- (7) Justification documents available here: [http://www.decc.gov.uk/en/content/cms/what\\_we\\_do/uk\\_supply/energy\\_mix/nuclear/new/reg\\_just/reg\\_just.aspx](http://www.decc.gov.uk/en/content/cms/what_we_do/uk_supply/energy_mix/nuclear/new/reg_just/reg_just.aspx)
- (8) Epidemiological Study on Childhood Cancer in the Vicinity of Nuclear Power Plants (KiKK Study). [http://www.bfs.de/de/bfs/druck/Ufoplan/4334\\_KIKK\\_Zusamm.pdf](http://www.bfs.de/de/bfs/druck/Ufoplan/4334_KIKK_Zusamm.pdf) (Go to page 13 for the English version).

For more info See: Commentary: Childhood Cancer near Nuclear Power Stations, Environmental Health Journal 23<sup>rd</sup> September 2009. <http://www.ehjournal.net/content/pdf/1476-069X-8-43.pdf>

#### 4. Cut the nuclear deficit

Green Party leader Caroline Lucas MP has published a report identifying well over £100 billion of potential savings from nuclear arms projects and subsidies to the nuclear power industry. In the report Britain's first Green MP argues that cancelling the Trident renewal will save over £100 billion, while axing proposed new nuclear power stations will save taxpayers around £8 billion in nuclear waste costs. (1)

It has become the mantra of ministers in the coalition Government that no subsidies will be provided to new nuclear power plants. Yet Energy Secretary Chris Huhne has admitted:

*"...we are not ruling out action by the Government to take on financial risks or liabilities for which it is appropriately compensated or for which there are compensating benefits."* (2)

He also announced that he would introduce a fixed unit price for waste disposal costs, a process which is likely to form a further subsidy. (3)

Several subsidies have already been detailed in a report by the Energy Fair Group, (4) including the unquantifiable subsidy of limited liability for nuclear operators in post major radiological accident situations. NuClear News No.22 also listed at least eight subsidies. Caroline Lucas's report looked at the cost of dealing with waste from new reactors. If 8 new nuclear reactor units were to be built in Britain the Committee on Radioactive Waste Management, (CoRWM) estimated in 2006 that the total volume of waste in a repository would increase by about 8%, but simultaneously the total radioactivity in the repository would increase by 300%. The price of waste disposal for a new build programme has been estimated, by consultant Ian Jackson, at around £8.2 billion. (5)

While ministers claim that under their plans companies operating new reactors will have to agree upfront to a "fixed unit price" for their radioactive waste – a plan they claim will avoid subsidies - this is seriously misleading. In his response to the Government's *Consultation on Funded Decommissioning Programme Guidance for New Nuclear Power Stations*, energy economist

Professor Gordon MacKerron, Director of the Sussex Energy Group at the University of Sussex and formerly Chair of CORWM (Committee on Radioactive Waste Management) explained:

*“The motive is clear: there is very large uncertainty about the costs of waste disposal and private investors will find investment in new nuclear power more attractive if they have upfront certainty about the price they will need to pay for waste disposal. This is not quite intervention in the “market”, because there is no conventional market in radioactive waste disposal, given Government’s monopoly supply position: but the proposal would effectively be a subsidy. This is because fixed unit prices are intended to make the expected cost (risk-adjusted) of nuclear investment lower than if private firms had to pay for the full costs of waste disposal directly.”*

In a written statement to Parliament on October 18<sup>th</sup> Energy Secretary Chris Huhne said the no-public-subsidy policy meant that *“there will be no levy, direct payment or market support for electricity supplied or capacity provided by a private sector new nuclear operator, unless similar support is also made available more widely to other types of generation.”* (6)

But he also said the Government will have to take on liability for both accidents and cleaning up the radioactive waste, so that power companies are confident of investing in the new technology. (7)

The government will be consulting later this year on amendments to the UK’s nuclear third-party liability regime. Nuclear operators’ liability for a severe accident is currently capped at £140 million. Amendments to international treaties allow for raising the cap substantially. According to *The Telegraph* the Government is looking at raising the upper limit that could be paid out by power companies in case of an accident to up to £1bn.

And the Government will take on ultimate responsibility for clearing up the waste in case the power companies go bust. Huhne’s reference to the government *“taking on financial risks or liabilities”* could mean taxpayers being called on to shoulder costs over and above the fixed-unit price the government plans to charge utilities for taking high-level waste and spent fuel from new reactors, if the costs come in higher than expected.

According to *The Guardian*, the Nuclear Decommissioning Authority (NDA) says the fixed-unit price could underestimate disposal costs, leaving the taxpayer to cover any shortfall, and inadvertently lead to a “futures market” where nuclear reactor companies trade radioactive waste like a commodity. Jean McSorley, a Greenpeace consultant, said: *“The NDA’s document reveals there is a substantial risk of underestimating the cost of disposing of waste from new reactors. Any shortfall would have to be paid by the taxpayer, resulting in a significant subsidy to the nuclear industry. The government has to stick to its promise of no more subsidies for new reactors and must act to close any loopholes in the proposed funding arrangements.”* (8)

Dieter Helm, Professor of Energy Policy at the University of Oxford, said that Mr Huhne’s pledge not to subsidise nuclear plants was more rhetoric than substance. He added: There has never been a nuclear programme which is entirely funded by the private sector. If the Government wants nuclear power to go ahead, it has to put a framework in place. It’s a matter of semantics whether it’s called a subsidy. (9)

Some commentators initially assumed that the coalition government’s agreement to support new reactors *“provided that they receive no public subsidy”* was a convenient way to shelve plans for new nuclear building, even though this policy was the same as the previous Labour Government’s. But later Chris Huhne’s insistence that *“[n]uclear will go ahead if investors come forward with proposals, as I think they will,”* changed the tone of the debate.

But EDF may be feeling a little different now, after its US partner, Constellation, pulled out of a project to build a new plant in Maryland. Constellation was financing the scheme using a loan guarantee from the government. But when it discovered the cost of that guarantee, the company

blanched, saying it would destroy the economics of the project. If Constellation is right, and such a project is economically unfeasible even with government subsidy, how can it be economic without it? The future of UK nuclear power is far from certain. (10)

- (1) Cut the Nuclear Deficit, by Caroline Lucas MP, with additional research by David Lowry, October 2010 [http://www.greenparty.org.uk/assets/files/reports/Cut\\_the\\_nuclear\\_deficit\\_2010\\_10.pdf](http://www.greenparty.org.uk/assets/files/reports/Cut_the_nuclear_deficit_2010_10.pdf)  
News from Brighton 20<sup>th</sup> October 2010 <http://newsfrombrighton.co.uk/brighton-politics/green-party/caroline-lucas-nuclear-report-identifies-100bn-of-potential-savings/>
- (2) Ministerial Statement on Energy Policy by Chris Huhne 18<sup>th</sup> October 2010, [http://www.decc.gov.uk/en/content/cms/news/en\\_statement/en\\_statement.aspx](http://www.decc.gov.uk/en/content/cms/news/en_statement/en_statement.aspx)
- (3) See Fixed Unit Guess, NuClear News No.20 <http://www.no2nuclearpower.org.uk/nuclearnews/NuClearNewsNo20.pdf>
- (4) Nuclear Subsidies, Energy Fair Group, October 2010 [http://www.mng.org.uk/gh/private/nuclear\\_subsidies1.pdf](http://www.mng.org.uk/gh/private/nuclear_subsidies1.pdf)
- (5) Ian Jackson, *Nukenomics: the commercialisation of Britain's nuclear industry*, Sidcup: Nuclear Engineering International Special Publications, 2008. <http://www.no2nuclearpower.org.uk/reviews/review03.php>
- (6) Ministerial Statement on Energy Policy by Chris Huhne 18<sup>th</sup> October 2010 [http://www.decc.gov.uk/en/content/cms/news/en\\_statement/en\\_statement.aspx](http://www.decc.gov.uk/en/content/cms/news/en_statement/en_statement.aspx)
- (7) Telegraph 19<sup>th</sup> October 2010 <http://www.telegraph.co.uk/earth/earthnews/8071311/Public-to-pay-for-new-nuclear-era.html>
- (8) Guardian 18<sup>th</sup> October 2010 <http://www.guardian.co.uk/environment/2010/oct/18/taxpayer-hit-nuclear-waste-bill-reactors>
- (9) The Times 19<sup>th</sup> October 2010 <http://www.thetimes.co.uk/tto/environment/article2771477.ece>
- (10) FT Blog 11th October 2010 <http://blogs.ft.com/energy-source/2010/10/11/constellation-and-edf-split-what-does-this-mean-for-british-nuclear/>

## 5. The Government is terrified of being seen as a subsidiser of nuclear power

“When I use a word,” Humpty Dumpty said, in a rather a scornful tone, “it means just what I choose it to mean—neither more nor less.”  
 “The question is,” said Alice, “whether you *can* make words mean so many different things.”  
 “The question is,” said Humpty Dumpty, “which is to be master—that’s all.”

Through the Looking Glass, Lewis Carroll (1872) (1)

Chris Huhne’s definition of a public subsidy (2) for new reactors leaves ample room for measures like a government-subsidized minimum carbon price, or even bringing nuclear power into an amended renewable obligation – in fact almost any kind of support. Some analysts are suggesting that lobbying by industry to widen the support beyond just the proposed carbon price floor has gained some ground. According to *The Sunday Times* the Government is terrified of being seen as a subsidiser of nuclear power, so whatever it comes up with will have to be called something else. (3)

Britain’s “big six” energy companies have warned Chris Huhne the proposed carbon floor price will not be enough of an incentive for them to invest in new nuclear power stations. They believe the framework developed so far to foster reactor construction is decidedly shaky. All agree that some form of additional incentive is required. Options range from a feed-in tariff to guarantee the price for low-carbon electricity to payments to companies as reward for having available generation capacity. Two consultations – one on the carbon price floor and another on electricity market reform – are expected later this autumn. RWE npower is threatening not to go-ahead with new reactors if there is still uncertainty next spring. EDF Energy called for a timely consultation on the carbon price floor and progress on reform of the electricity market and has proposed low carbon capacity payments to support security of supply. (4)

Nigel Hawkins, a fellow with the Adam Smith Institute, has been promoting the idea of converting the renewables obligation into a low-carbon obligation to include nuclear power. (5) And utilities have started talking about the need to treat nuclear technology in the same way as wind power. RWE npower argues that the Government should not discriminate between different technologies, but should ensure there is a “level playing field” for all.

The proposed green investment bank might provide loan guarantees and insurance against cost overruns on major energy projects. Full details of the coalition’s plan for a green investment bank will be set out in the spring of next year, the Treasury said as it outlined a National Infrastructure Plan. The bank will provide early high-risk investment in nuclear, large offshore wind, carbon capture and other green technologies with the aim of leveraging in the large amounts of private sector investment needed. (6)

The National Infrastructure Plan (7) says the UK needs to spend £200bn on infrastructure investment over the next five years – a 30 per cent increase on spending over the five years to 2010, and an investment that will have to be made despite big cuts to the amount of public capital available.

But Chancellor George Osborne says the government will put just £1 billion into the bank; a paltry sum compared to the mountain of cash needed. And the cash won’t be available until 2013. Energy executives, who are hectored relentlessly about the need to invest billions in low-carbon power, are appalled, according to *The Sunday Times*. But asset sales will be used to boost the £1bn available to the bank. The government is reported to be exploring the sale of its stake in Urenco, the firm that makes enriched uranium for nuclear power, to help finance the bank (8) but, as *The Guardian* reminds us, a previous attempt by the Labour government to sell its share in Urenco, in 2006, failed because it was blocked by the other shareholders. This may raise concerns about how long any fund-raising will take. (9)

- (1) [http://en.wikipedia.org/wiki/Humpty\\_Dumpty](http://en.wikipedia.org/wiki/Humpty_Dumpty)
- (2) Ministerial Statement on Energy Policy by Chris Huhne 18<sup>th</sup> October 2010  
[http://www.decc.gov.uk/en/content/cms/news/en\\_statement/en\\_statement.aspx](http://www.decc.gov.uk/en/content/cms/news/en_statement/en_statement.aspx)
- (3) Sunday Times 24th Oct 2010  
<http://www.thesundaytimes.co.uk/sto/business/Companies/article426651.ece>
- (4) FT 25th Oct 2010 <http://www.ft.com/cms/s/0/007c852e-df9b-11df-bed9-00144feabdc0.html>
- (5) Re-energising Britain, by Nigel Hawkins, Adam Smith Institute 2009  
<http://www.adamsmith.org/publications/regulation-and-industry/re%11energizing-britain/>
- (6) FT 26<sup>th</sup> October 2010 <http://www.ft.com/cms/s/0/2bb7f74c-e071-11df-99a3-00144feabdc0.html>
- (7) National Infrastructure Plan 25<sup>th</sup> October 2010 [http://www.hm-treasury.gov.uk/ppp\\_national\\_infrastructure\\_plan.htm](http://www.hm-treasury.gov.uk/ppp_national_infrastructure_plan.htm) For more info on the National Infrastructure Plan see Bircham Dyson & Bell 27<sup>th</sup> October 2010 <http://www.bdb-law.co.uk/blog/180-national-infrastructure-plan-published>
- (8) Building 25th Oct 2010 <http://www.building.co.uk/sectors/infrastructure/green-investment-bank-could-be-funded-by-nuclear-sale/5007878.article>
- (9) Guardian 21<sup>st</sup> October 2010 <http://www.guardian.co.uk/environment/2010/oct/21/urenco-green-investment-bank>

## 6. Subsidy News

The UK government is to provide £2 million to help fund twenty feasibility studies aimed at stimulating innovation and strengthening the supply chain in the area of nuclear research and development (R&D) and its applications. The funds are to be provided through the Technology Strategy Board (TSB), set up by the government to promote and support research into, and development and exploitation of, technology and innovation. It is sponsored by the Department for Business, Innovation and Skills (BIS).

World Nuclear News 28th Sept 2010 [http://www.world-nuclear-news.org/NP-Boost\\_to\\_UK\\_nuclear\\_technology\\_RandD-2809104.html](http://www.world-nuclear-news.org/NP-Boost_to_UK_nuclear_technology_RandD-2809104.html)



The South West RDA and the Learning and Skills Council are investing in a major new energy skills centre for the South West of England. The RDA is investing £2 million, with a further £2.25 million from the Learning and Skills Council and the land donated by Sedgemoor District Council for the new facility at Bridgwater College in Somerset.

Nuclear Energy: All the Right Elements, South West England RDA

[http://www.southwestengland.co.uk/next\\_steps/idoc.ashx?docid=d1d17e20-e1b4-4d54-86df-af39995a2754&version=-1](http://www.southwestengland.co.uk/next_steps/idoc.ashx?docid=d1d17e20-e1b4-4d54-86df-af39995a2754&version=-1)

A new group “No Money for Nuclear” has been formed to concentrate on one issue - the level of support the nuclear industry will receive for building new nuclear power stations contrasted with the severity of public expenditure cuts already announced.

See <http://www.nomoney4nuclear.org.uk>

### **7. Nine old people dying every hour from cold related illnesses – one house refurbishment needed every minute**

The number of households struggling to afford to stay warm has more than doubled in the past six years, according to official figures. Rising energy bills have pushed an extra 2.5 million homes into fuel poverty since 2004, a report by the Department of Energy and Climate Change (DECC) said. Yet the Government appears to be retreating from a longstanding commitment to eradicate fuel poverty by 2016. Greg Barker, the energy and climate change minister, said only that the Government would do “*all that is reasonably practicable*” to try to meet the target. DECC also revealed that the number of deaths linked to cold, damp housing had risen from 28,000 in 2007 to 41,000 last year. (1)

In Scotland, where there were 2,764 excess winter deaths last year, (2) Alex Salmond’s announcement that the target for 2020 for the amount of electricity generated from renewable sources will be increased from 50 per cent to 80 per cent and 100% by 2025, has generated a debate about how this should be paid for. *The Scotsman* has called the ‘Green Energy Bill’ “*too much to bear*”. (3)

Nick Horler, chief executive of Scottish Power, says consumers face a hike in fuel bills of up to £100 a year. The average customer’s annual dual fuel bill is £1,030, with £19 going towards renewables. Scottish Renewables, the renewable energy trade body, points out that all energy policy options will lead to higher bills for consumers over the medium and longer term. (4)

Elizabeth Gore, deputy director of Energy Action Scotland, the fuel poverty charity, called for a debate on how the development of renewable energy should be financed. She says “... *no matter how much you earn you are still paying the same towards the cost of promoting renewable energy. The concern now is growing that the amount which is being added on or will be added in the future is too much of a burden and those on a low income will be forced to use their heating only once a day or have one hot meal to try to save money. If the renewables sector was financed through taxation it would take into account how much you earn.*” (5)

Charles Moore, in *The Telegraph*, complains that electricity consumers pay for the renewable obligation subsidies, and the Feed-in Tariff. “*We pay more and more for sources of energy which will not reward us with cost reductions for at least a generation. For years, governments have gone on about the wickedness of "fuel poverty". Today, 4.6 million households are officially defined as living in it. The prevailing policies make it inevitable that fuel poverty will rise for as far as the eye can see. By 2020, our energy prices will be between 30 and 40 per cent higher than they would have been without them*”. (6) *The Telegraph* seems to think support for renewables will cost every household around £300 every year. (7)

Clearly energy efficiency is the answer, and since heating represent half of the UK's carbon emissions, we are going to have to transform the fabric efficiency of our buildings in any case. If action is not taken, rising fuel costs could bring large numbers of families into fuel poverty with more and more vulnerable people unable to afford to keep warm in winter. The scale of the task is huge. The low-carbon refurbishment of over 20 million existing homes by 2050 in the UK may cost £500 billion at the rate of £250 million each week - with one house needing to be refurbished every single minute. (8) But massive benefits will flow from such a programme: elimination of fuel poverty, the creation of hundreds of thousands of new skilled jobs, reduced need for expensive investment in renewable and nuclear energy, and greatly reduced dependence on imported fossil fuels. This urgently needed transformation is not currently happening because of major barriers to change: financial, regulatory, skill shortages and contemporary construction processes.

Greg Barker, the minister of state for energy and climate change, seems to understand. He says few people have grasped how large the task of refurbishing the UK's entire housing stock will be, but it will drive high levels of investment and create many green jobs. Basic changes, such as the installation of loft and solid wall insulation, will have to be carried out, but there are many other interventions that can take place as well. In the Comprehensive Spending Review, George Osborne announced £860 million for a Renewable Heat Incentive. (9)

With the Feed-in Tariff up and running, and having escaped mostly unscathed in the Comprehensive Spending Review, and the news that the Renewable Heat Incentive will start in June next year, ways need to be found to ensure that low income households can benefit from these schemes (10) and there should also be a long overdue promotion of community heating schemes targeted at lower income areas. (11)

The Scottish Government's long overdue Energy Efficiency Plan (12) has a headline target to reduce total energy consumption by 12% by 2020. The Government says it will proactively develop district heating as a discrete policy area within energy efficiency by appointing a dedicated officer, support a number of local heat mapping and feasibility projects over 2010/11, look at training for planning authority officers and pursue options to finance district heating projects.

And new houses will have to be built to a much higher standard. Imagine living in a house that costs just £75 to heat a year, not because you have scrimped, saved and shivered your way through winter, but because of its subtle but super-efficient design. Welcome to the world of PassivHaus building, or 'passive houses' as they are known as in the UK. (13)

- (1) The Times 15<sup>th</sup> October 2010 <http://www.thetimes.co.uk/tto/environment/article2768210.ece>
- (2) Scotsman 28<sup>th</sup> October 2010 <http://thescotsman.scotsman.com/news/Winter-death-toll-falls-despite.6602340.jp>
- (3) Scotsman 29<sup>th</sup> September 2010 <http://thescotsman.scotsman.com/leaders/Leader-Green-energy-bill-is.6555720.jp>
- (4) Scotsman 2<sup>nd</sup> October 2010 <http://thescotsman.scotsman.com/letters/Letter-Mix-of-energy.6561565.jp>
- (5) Scotsman 29<sup>th</sup> September 2010 <http://thescotsman.scotsman.com/news/Going-green-will-push-Scots.6555917.jp?articlepage=2>
- (6) Telegraph 22<sup>nd</sup> October 2010 <http://www.telegraph.co.uk/comment/columnists/charlesmoore/8081276/Spending-Review-Honesty-is-the-best-policy-before-the-bigger-fuel-bills-start-to-bite.html>
- (7) Telegraph 17<sup>th</sup> October 2010 <http://www.telegraph.co.uk/earth/environment/8069547/Household-bills-to-rise-to-fund-energy-revolution.html>
- (8) 24 Dash 18<sup>th</sup> October 2010 <http://www.24dash.com/news/housing/2010-10-18-UK-must-refurbish-one-house-a-minute-until-2050-conference>
- (9) Low Carbon Economy 22<sup>nd</sup> October 2010 [http://www.lowcarboneyconomy.com/community\\_content/\\_low\\_carbon\\_blog/11447/task\\_of\\_renovating\\_uk\\_housing\\_stock\\_underestimated](http://www.lowcarboneyconomy.com/community_content/_low_carbon_blog/11447/task_of_renovating_uk_housing_stock_underestimated)
- (10) Business Green 8<sup>th</sup> October 2010 <http://www.businessgreen.com/business-green/news/2271199/bright-future-social-housing>

- (11) Scotsman 25<sup>th</sup> October 2010 <http://thescotsman.scotsman.com/news/Share-boilers-to-save-on.6596610.jp>
- (12) Energy Efficiency Action Plan, Scottish Government 6<sup>th</sup> October 2010 <http://www.scotland.gov.uk/News/Releases/2010/10/06101313> See also Business Green 6<sup>th</sup> October 2010 <http://www.businessgreen.com/business-green/news/2271054/scotland-aims-slash-energy-per>
- (13) The Ecologist 22<sup>nd</sup> October 2010 [http://www.theecologist.org/green\\_green\\_living/home/641800/passivhaus\\_construction\\_the\\_future\\_of\\_uk\\_housebuilding.html](http://www.theecologist.org/green_green_living/home/641800/passivhaus_construction_the_future_of_uk_housebuilding.html)

## **8. Local Energy Revolutions – Birmingham goes solar and Oxfordshire turns to poo power.**

Birmingham City Council, run by a Conservative-Liberal Democrat coalition, has drawn up plans to install solar panels on 10,000 council houses. It is the biggest proposal for retrofitting houses through an energy efficiency upgrade yet seen in the UK. The council agreed the £100m proposal to create jobs and meet the city's ambitious targets for reducing carbon emissions.

The plan, drawn up after two successful pilot schemes, will be funded by the council and investment from energy suppliers and commercial banks. Paul Tilsley, deputy leader of Birmingham city council, said: "*This scheme will significantly improve the lives of people in Birmingham, setting a green standard beyond that of any city in the world.*" Consumers will pay a levy on their energy bills to repay the loans but Sandy Taylor, head of the city's climate change unit, said households would still be paying lower bills after the retrofit.

The next phase of the programme will involve using the proceeds from the first 10,000 retrofits for a refinancing of the scheme that will deliver funding of £2bn, enough to refurbish 200,000 homes. Taylor said that the council would begin by targeting those households with the greatest social need, singling out people living in fuel poverty or who were particularly vulnerable. Eventually, he added, the plan was to upgrade all 420,000 homes in the city, which would mean moving on from publicly owned homes to those currently owner-occupied or in the private rented sector. (1)

Meanwhile, in Oxfordshire, Centrica is opening a plant at Didcot sewage works which will be the first in the UK to produce renewable gas for households to use. National Grid believes at least 15% of all gas consumed could be made from sewage slurry, old sandwiches and other food thrown away by supermarkets, as well as organic waste created by businesses such as breweries.

Now, up to 200 Oxfordshire homes will be using biomethane made from sewage they had flushed away three weeks earlier. British Gas, Thames Water and Scotia Gas Networks now hope to roll out the process across the UK. The practice of using anaerobic digesters - carefully managed bacteria - to turn faeces into a means of generating electricity is already well established across the country. British Gas says supplying renewable gas directly is much more efficient, as about two thirds of the energy is lost when electricity is generated. So an additional plant installed earlier this year at the Thames Water sewage treatment works in Didcot cleans up the spare biogas that is produced and turns it into biomethane suitable for household hobs and in gas central heating.

United Utilities is hoping its similar £4.3m scheme, which would cater for 500 homes in Manchester, will be ready by summer 2011. The UK produces 1.73 million tonnes of sewage sludge every year, which could potentially be used to produce biogas. Hypothetically, if all of the UK's 9,600 sewage treatment facilities in the UK were fitted with this type of technology, they could provide enough renewable gas for up to 350,000 homes. (2)

Adnams the brewer has opened an anaerobic digestion facility in Suffolk using waste slurry which will provide renewable gas to about 235 homes. British Gas is also involved in this project and is planning to open three more. (3)

To keep up with the local energy revolution going on around the UK watch for weekly news updates here: <http://www.microgenscotland.org.uk/newsarchive.php>

- (1) Guardian 3<sup>rd</sup> October 2010 <http://www.guardian.co.uk/environment/2010/oct/03/birmingham-solar-panel-council-proposal>
- (2) BBC 5th October 2010 <http://www.bbc.co.uk/news/uk-11433162>
- (3) Guardian 5th October 2010 <http://www.guardian.co.uk/business/2010/oct/05/human-waste-turned-renewable-gas>

## 9. A nuclear dump for West Cumbria?

The results of the British Geological Survey (BGS) high-level study into the suitability of the geology of West Cumbria to host a nuclear waste 'Geological Disposal Facility' have been published a month later than expected. (1) The West Cumbria Managing Radioactive Waste Safely (WCMRWS) Partnership resumed business on 28<sup>th</sup> October after its September meeting was postponed because the Government had failed to agree funding for the Partnership. (2)

The BGS report does not show where a facility would eventually be located, but has been produced to avoid unnecessary work in areas which are clearly unsuitable based on high-level geological exclusion criteria. A detailed map highlighting the unsuitable areas can be viewed here: <http://www.cnnewmedia.co.uk/locker/wh/pdf/mapcomb.jpg>. The excluded area is highlighted in pink. (3)

A major communications and engagement programme will now be launched in Cumbria to give people the chance to find out about the Government's search for somewhere to build an underground repository for the country's higher activity radioactive wastes. (4) The West Cumbria Managing Radioactive Waste Safely (MRWS) Partnership is looking at whether West Cumbria should take part in the search for a site, without any commitment to eventually host a geological disposal facility. A series of Community Drop-In Events across the county will include an exhibition and give people a chance to talk to members of the Partnership. Representatives from the Department of Energy and Climate Change, the Nuclear Decommissioning Authority and the BGS will also be there to answer questions about government policy and technical issues. There is also a pack with information and a DVD which people can use to arrange a group to discuss some of the key issues and give the Partnership their views. To request a pack email your name and address to [helenf@3kq.co.uk](mailto:helenf@3kq.co.uk) or phone 0800 048 8912.

Meanwhile, Professor David Smythe (Emeritus Professor of Geophysics, University of Glasgow) has said no site in west Cumbria is suitable for geological disposal of nuclear waste. In a letter to the Whitehaven News Prof Smythe, who was involved in the Nirex project to find a nuclear waste repository at Sellafield, says the 1995-96 inquiry effectively ruled out the whole of West Cumbria as a suitable location for nuclear waste disposal.

*"The fundamental reason is not hard to grasp. Just stand with your back to the sea, anywhere on the coastal plain, looking inland at the mountains of the national park. Imagine the rain falling on these mountains, percolating – however slowly and imperceptibly – through fissures and cracks in these slates and lavas, down towards the sea, over centuries and aeons ... the very large hydraulic head of underground water near the coast, thanks to the height of the mountains inland, means that some of this water can percolate back upwards to the surface on its progress to the sea."* (5)

Radiation Free Lakeland has been given permission to publish the full text of an article by David Smythe and Stuart Haszeldine published in Geoscientist in 1997. The article describes the Nirex Inquiry into proposed "geological disposal of high level nuclear waste in West Cumbria" following years of research costing £400M. The conclusion: "The Planning Inspector's comprehensive dismissal makes it hard to contemplate a return to this site, even ten years in the future". (6)

David Smythe says the screening process by the British Geological Survey (BGS) only had a narrow remit to rule out areas of potential natural resources, including groundwater. This does not mean that the remaining areas have been deemed suitable for geological disposal.

- (1) BGS Report Non-Technical Summary. [http://www.westcumbriamrws.org.uk/documents/115-BGS\\_non-technical\\_summary.pdf](http://www.westcumbriamrws.org.uk/documents/115-BGS_non-technical_summary.pdf)
- (2) See NuClear News No.22 <http://www.no2nuclearpower.org.uk/nuclearnews/NuClearNewsNo22.pdf>
- (3) Whitehaven News 28th October 2010 <http://www.whitehaven-news.co.uk/news/unsuitable-uke-dump-sites-revealed-1.773666?referrerPath=home>
- (4) The advertorial included in local press is available here: <http://www.cnnwmedia.co.uk/locker/ns/image/osprey%20broadsheey%2054x10%208col%20v4b.pdf>
- (5) Whitehaven News 6<sup>th</sup> October 2010 <http://www.whitehaven-news.co.uk/letters/you-say/copeland-we-re-working-with-and-listening-to-businesses-1.765850?referrerPath=letters>
- (6) Radiation Free Lakeland 8<sup>th</sup> October 2010 <http://web.mac.com/marianebirkby1/iWeb/Radiation%20Free%20Lakeland/Dump%20Diary%20UPDATED%2025TH%20OCT%202010-/42023A72-E20F-4CED-9B79-B0D4F7544540.html>  
Also See Nirex case didn't hold water by Dr Rachel Western, Safe Energy Journal 112, March - May 1997 <http://www.no2nuclearpower.org.uk/articles/se112-Western.pdf>

## 10. European Directive goes for deep disposal

The European Commission is all set to propose deep underground 'disposal' for high level waste, according to a leaked copy of a draft directive. According to the draft document, "*deep geological disposal represents the safest and most sustainable option as the end point of the management of high level waste and spent fuel considered as waste*". The Commission argues that most member states have yet to draw up plans to deal with radioactive waste even though many EU countries have operating nuclear power plants. The Commission believes EU wide "enforceable" legislation would ensure radioactive waste not only from nuclear power plants but also health care and other industries would be tackled effectively. (1)

Under the new proposals, to be unveiled by Günther Oettinger, the EU Energy Commissioner on 3rd November, member states would be legally obligated to draw up plans for radioactive waste disposal. While member states would still be responsible for managing their radioactive waste disposal programme, independent auditors would be appointed to regulate the process. Greenpeace has voiced strong criticism of the proposals and claimed the European Commission has ignored key questions such as the rock behaviour, human interference among other factors. "*The European Commission is pushing for deep geological disposal against a lot of problems that need to be resolved,*" said Jan Haverkamp, EU energy campaigner at Greenpeace. "*The Commission has turned its draft directive into a blatant piece of PR for one radioactive waste management technique, in spite of the fact that this technique – deep geological disposal – is currently facing many scientific and engineering challenges.*" (2)

The Greens in the European Parliament accused Oettinger of insufficient consultation. Green MEP Rebecca Harms (Germany) said the written procedure without a debate used by the Commission was not adequate for such an important decision. She also questioned the scientific consensus in favour of deep storage, saying that deciding on the best options would require an open scientific debate.

The draft directive only briefly mentions responsibility for financing the management of nuclear waste. It requires member states to ensure that adequate financial resources are available, "*taking due account of the responsibility of radioactive waste producers*". The Greens argued that the costs would need to be calculated by an independent body to make sure they are reliable. In France, for instance, estimated costs for final disposal by electricity utility EDF have more than doubled in a few years. Rebecca Harms highlighted the case of a salt mine at Asse in Lower Saxony where 126,000 barrels filled with radioactive waste will have to be retrieved. It is feared the unprecedented recovery of the waste from a depth of several hundred metres will cost billions of euros.

- (1) eGov Monitor 27<sup>th</sup> October 2010 <http://www.egovmonitor.com/node/39179>
- (2) EurActiv 27<sup>th</sup> October 2010 <http://www.euractiv.com/en/energy/eu-propose-burying-nuclear-waste-safest-option-news-499190>
- (3) The Parliament 26<sup>th</sup> October 2010 <http://www.theparliament.com/latest-news/article/newsarticle/eu-commission-nuclear-waste-plans-full-of-gaps/>

## 11. Nuclear reactors threatening Middle East arms race

*The Times* (1) has taken up a theme first reported in the no2nuclearpower briefing on ‘The Civil Nuclear Power Revival and Nuclear Proliferation’ in May 2008. (2) The Middle East, says *The Times*, is poised for a dramatic surge in nuclear power development over the next two decades. By 2025, at least 15 new reactors will be built across the region, from Egypt and Turkey to the United Arab Emirates. With Iran’s centrifuges at Natanz still spinning uranium in defiance of international conventions, fears will mount that the plans now being announced by Middle East governments mark the first steps in a nuclear arms race across this volatile region.

If Iran’s nuclear programme goes unchecked there are genuine concerns of a surge in proliferation among its neighbours. “*There is the feeling that getting started on the nuclear ladder is prudent, given Iran’s assumed ambitions,*” said Mark Fitzpatrick, senior fellow for non-proliferation at the International Institute for Strategic Studies in London.

- (1) The Times 8<sup>th</sup> October 2010  
<http://www.thetimes.co.uk/tto/news/world/middleeast/article2758445.ece>
- (2) The Civil Nuclear Power Revival and Nuclear Proliferation, No2NuclearPower, May 2008  
<http://www.no2nuclearpower.org.uk/reports/ProliferationBriefMay08.pdf>

## 12. Europe - 100% renewable?

Deploying all current low-carbon technologies to their maximum potential could see Europe cut carbon dioxide emissions by 80% by 2050. That is a conclusion of the European Climate Foundation’s (ECF’s) Roadmap 2050 report. NuClear News No.18 (1) covered the launch of the ECF report in April, but the group has been launching it in different countries around Europe. Its launch in London was covered by World Nuclear News. (2)

The report shows that it is possible for Europe’s electricity to be supplied by 100% renewables with a bit of clever grid management. Dr Allott of WWF made this key point at the London launch event for the Roadmap 2050. He said a 100% renewables future for Europe was achievable, affordable and offered levels of system stability as high as today’s power networks. He made clear that, given wider concerns on the sustainability and costs of nuclear power and carbon capture and storage, WWF strongly favours the 100% renewables future.

- (1) <http://www.no2nuclearpower.org.uk/nuclearnews/NuClearNewsNo18.pdf>
- (2) World Nuclear News 6<sup>th</sup> October 2010 [http://www.world-nuclear-news.org/EE\\_New\\_EU\\_energy\\_paper\\_points\\_to\\_increased\\_role\\_for\\_nuclear\\_0510102.html](http://www.world-nuclear-news.org/EE_New_EU_energy_paper_points_to_increased_role_for_nuclear_0510102.html)

## 13. Cavalier attitude to reducing discharges

The life of Wylfa, one of the UK’s two remaining Magnox stations, has been extended by two years to December 2012. (1) Dylan Morgan, of People Against Wylfa B (Pawb) said the plant should be closed, as planned in December this year. “*They have already had two extensions - it is well past its design life,*” he said. “*It can only increase the danger during operation, and it increases the waste produced.*” (2)

Oldbury, the other operating Magnox station, is also seeking permission to run one of its reactors until mid-2012. (3) According to the NDA these life extensions will have a very limited effect on total

inventory of Magnox spent fuel to be reprocessed through the Magnox reprocessing plant at Sellafield - adding less than 2.5% to the total remaining inventory. (4) Nevertheless it indicates a cavalier attitude by the UK to its international commitments to reduce radioactive discharges as soon as possible given that Magnox reprocessing is responsible for around 80% of Sellafield's discharges.

The Celtic League has urged the Irish government to press the UK to publish the 'safety case' for the extension of the Wylfa nuclear power plant. Wylfa nuclear plant has had a chequered safety record over the years and the decision to extend its operations poses a threat to Irish Sea communities. The operating extension is not only questionable on safety grounds. Four years ago the NDA said it was "simply totally uneconomic" to extend the plant's life for a further two or four years (beyond 2010), as was being proposed at that time. (5)

- (1) Bloomberg 13<sup>th</sup> October 2010 <http://www.bloomberg.com/news/2010-10-13/u-k-s-wylfa-nuclear-station-will-operate-until-2012-update1-.html>
- (2) BBC 13<sup>th</sup> October 2010 <http://www.bbc.co.uk/news/uk-wales-11531729>
- (3) Reuters 23<sup>rd</sup> August 2010  
<http://www.reuters.com/article/idUKLDE67M0TE20100823?type=companyNews>
- (4) NDA Draft Strategy, published for consultation September 2010, para 3.2.1  
<http://www.nda.gov.uk/documents/upload/Draft-Strategy-published-September-2010-for-consultation.pdf>
- (5) Celtic League 13<sup>th</sup> Oct 2010 [http://groups.yahoo.com/group/celtic\\_league/message/3509](http://groups.yahoo.com/group/celtic_league/message/3509)