

Issue: Response to the DECC's consultation to review of the Siting Process for a Geological Disposal Facility September 2013,ⁱ for disposing of higher activity radioactive wastes, including spent fuel.

Deadline: 5th December 2012

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The consultation document - and the questions asked in it - can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/239237/Consultation_Review_of_the_siting_process_for_a_GDF_FINAL.pdf

There are several proposals in the consultation document on a national nuclear dump, or geological disposal facility (GDF). The most contentious are discussed below. There is also a further critique of the revised process which discusses public and NGO involvement. This is the link: http://www.no2nuclearpower.org.uk/wp/wp-content/uploads/2013/11/ANDREW_BLOWERS_GDF_Siting_Consultation_Sept._2013.pdf

Voluntarism still at risk – Right of Withdrawal finishes earlier

The consultation document - CD (Para 1.57) still contains the threat, to remove voluntarism if that approach does not work. That threat, which is in the original Managing Radioactive Waste Safely White Paper, should be removed.

Linked to voluntarism is the issue of the 'Right of Withdrawal' (ROW), which covers when a community can pull out of any process concerning a nuclear dump. Under the current policy the RoW ends when construction of a GDF starts, yet the CD proposes the last chance to exercise the RoW should instead come when investigative boreholes are sunk; this would end the voluntary process years earlier than at present.ⁱⁱ Why should any future community have less time to exercise its rights as a volunteer than the communities of Cumbria had when they considered this issue?

The proposal of question 1 is rejected.

Local democracy and input

The CD proposes that only a district council or unitary authority would have the power to enter into discussions on hosting a GDF; this deliberately sidelines county councils, parish councils and neighbouring local authorities. The current policy states the other bodies listed above should be involved in consideration of a nuclear dump, but under the new proposals they do not have to be included.

The revision looks very much like an attempt to overcome the concerns of authorities like Cumbria County Council, which voted against progressing a nuclear dump in Cumbria in January (Kent County Council was also opposed to Shepway considering a nuclear dump in its area).

The CD proposes a three member Steering Group would be set up including a single relevant local authority, the Nuclear Decommissioning Authority (as the developer of the GDF) and Government - in the form of the Office for Nuclear Development.ⁱⁱⁱ This would see a Steering Group comprising of two units of Government bound by the same policy.

The Steering Group (CD Para 2.54) would be left to appoint organisations as it saw fit to a consultative partnership, a proposal which leaves room for bias and exclusion as there is no obligation for who should be appointed e.g. parish councils. The idea of an appointed (and possibly limited) consultative partnership, rather than a participative partnership with powers to make recommendations, is not acceptable. Environmental organisations might be appointed to the Partnership, but the CD, however, indicates it would rather have NGO involvement through a separate process that effectively eliminates real involvement by such organisations (Para 2.83).

It is said the GDF will be a project of national importance. If so, it cannot and should not be dealt with in the way proposed by the CD. An independent commission, which represents all levels of elected bodies in a given area i.e. the relevant district council, the county council, parish councils, any neighbouring authorities, as well NGOs, academia and others should be established. This is essential in order for appropriate oversight of whatever plans comes forward. The NDA, as the developer, and the Government as promoter of the GDF and facilitator of new nuclear reactors must not be involved directly in this process.

The proposals under question 2 are rejected.

Geology before voluntarism

Despite many organisations calling for in-depth geological investigation across England and Wales – prior to asking for new or renewed volunteering - the Government continues to resist this idea. This risks a place with the wrong geology coming forward before the geology is understood. The CD does propose limited work on geology is undertaken but only after a community enters into the process; and before the steering group is formed. More in-depth investigation – boreholes – would take place after the right of withdrawal ends.

The proposal under question 4 is rejected. Geology should come before voluntarism to avoid waste of time and energy in the wrong area; 'suitable' geology cannot however be used instead of voluntarism, the two must go together.

Nuclear dump to have a National Policy Statement

The CD proposes that a GDF project should be classed as a Nationally Significant Infrastructure Project (NSIP) and that a draft National Policy Statement (NPS) would be published as soon as the revised siting process is issued. Experience of the 2011 NPS for new nuclear power plants shows how these generic policy statements use 'in principle' decisions to take away the powers of local communities and councils on key issues e.g. the new reactor NPS effectively shut down any discussion on radioactive waste management at reactor sites.

It is possible that a NPS for a GDF would foreclose discussion on the surface facilities related to a nuclear dump: these could include a spent fuel packaging plant as the surface works at a GDF (as already proposed) and possibly also a central store for spent fuel from new reactors. A central store would see the long term storage of spent fuel at a GDF. The timing of the proposals for the NPS show this would be decided on before any community or local authority could fully consider what the NPS contained and its potential impact.

The proposal as put in question 5 is rejected; there should be no NPS for a GDF

All radioactive waste to go into a single dump site

The CD proposes to change the present 'baseline' inventory on what wastes to go into a national nuclear waste dump. Under the current policy this baseline consists of legacy wastes (existing and committed wastes from operating nuclear facilities) and that changes would have to be *agreed with any local community which might host a GDF.*^{iv}

The CD proposes that baseline should include all legacy wastes *and* all higher activity wastes from a 16GW programme of new reactors (as well MOX - plutonium/uranium - spent fuel and an unknown amount of defence waste).

The proposed change would remove the right of any community or local authority, which in the future might consider hosting GDF, having a say in how much waste they would accept.

- The biggest problem with new build waste will be the high-burn up spent fuel which is highly radioactive and intensely hot.
- The levels of radioactivity in new reactor wastes are estimated at more than four times that contained in the legacy waste 'stockpile'.^v
- The relatively small volumes of new reactor wastes would require a lot of room for disposal in a GDF, primarily because of the spent fuel (due to its radioactivity and heat generation).^{vi}This would lead at least to the doubling, or quite possibly the tripling of the size of a repository than for legacy wastes only.^{vii}This, in turn, would create problems in terms of the amount of spoil generated by building a GDF.

The proposal under question 6 is rejected. The inventory for disposal should remain subject to discussion and agreement by all relevant communities and local authorities: the wastes from new reactors wastes and defence wastes should not automatically be included in the 'baseline.'

Health Impacts

Decisions have already been made to prevent any discussion in the future on the radiological health impacts of a GDF.^{viii} That such decisions have been made is plainly unjust and unethical. This matter must be open for full examination during further discussions on a GDF. As the developer of the GDF, the NDA must not be the organisation which oversees any aspect of the health debate (CD Para 4.29).

Storage not disposal

The CD restates the Government's belief that geological disposal is *the* appropriate means for managing the UK's most highly radioactive wastes, despite the fact disposal is not a proven option.^{ix} The scope of the consultation is set on finding a GDF, rather than considering nuclear waste management holistically.

This push for disposal, which might ultimately be met only by making a community take a GDF, has seen little effort made on the siting strategies and technical needs essential for interim storage. Storage has to be properly addressed in case the 'right geology and volunteer community' combination is never found, or in the event of major delays.

The original recommendations on storage, by the first Committee on Radioactive Waste Management (CoRWM) must be revisited. The Government must commit to a durable storage programme for nuclear wastes at all major licensed nuclear sites.

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/239237/Consultation_Review_of_the_siting_process_for_a_GDF_FINAL.pdf

ii Boreholes and other intrusive investigations would presumably be covered, for planning purposes, under the national planning statement which is proposed.

iii No information is given on what process would be used to measure community support, or what level is required, before a local authority enters into the any news process

iv 2008 Managing Radioactive Waste Safely, White Paper, (A.6 page 72)

<http://www.official-documents.gov.uk/document/cm73/7386/7386.pdf> (A.6, page 72) states: Any final agreement with a community on a preferred site for the geological disposal facility will need to address possible changes to the Inventory in future years.

v Based on estimates in a report from the Committee on Radioactive Waste Management that wastes from a 10GW new reactor programme would increase the radioactivity in the inventory by 265%. Using a per GW equivalent comparison the increase from a 16GW programme – in terms of radioactivity would be 424%

See Committee on Radioactive Waste Management (CoRWM) inventory summary, January 2007
<http://webarchive.nationalarchives.gov.uk/20130503173700/http://corwm.decc.gov.uk/assets/corwm/pre-nov%202007%20doc%20archive/plenary%20papers/2006/25%20-%2026%20january%202006/1531%20-%20inventory%20summary%20information.pdf>

vi It is estimated that the types of wastes from a 10GW new build programme would add approx 8%-10% the volume of existing legacy wastes. Using a per gigawatt comparison, a 16GW programme would add 13%-16% in terms of volume of wastes over legacy amounts.

vii The size of a GDF will depend on the amount of radioactive waste disposed of (by volume and radioactivity) and the rock type chosen e.g. page 77 Final Report MRWS Partnership 2012.
http://www.westcumbriamrws.org.uk/documents/306-The_Partnership%27s_Final_Report_August_2012.pdf

Higher Level Radioactive Waste: Likely inventory range; the process for altering it; how the community might influence it and understanding the implications of new nuclear build. Presented to West Cumbria Managing Radioactive Waste Safely Partnership, Pete Roche, 5th August 2010.
http://www.nuclearwasteadvisory.co.uk/wp-content/uploads/2011/05/Inventory_presentation_to_WCMRWS_Aug2010.pdf

viii Under the process of 'Justification' under which the potential disadvantages of disposal (e.g. damages to health) are weighed against the possible benefits of nuclear activities. For the disposal of new reactor waste, for example, this was decided on by the Government in December 2010. Documents from DECC See discussion on Justification in: http://mrwsold.org.uk/wp-content/uploads/2011/11/McSorley_CONSULT_RESPONSE_23_MARCH_2012-FINAL1.pdf

ix <http://www.greenpeace.org/eu-unit/en/Publications/2010/rock-solid-a-scientific-review/>