

Nuclear Free Local Authorities Secretariat

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Chair: Bailie George Regan Secretary: Sean Morris



Dean Gallacher
Department of Energy and Climate Change (DECC)
3 Whitehall Place
London
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21st September 2009

Dear Mr Gallacher,

Long Term Plutonium Management: Key Factors Discussion Paper Comments from Nuclear Free Local Authorities

The NFLA* are grateful for the opportunity to comment on the DECC discussion paper on the key factors in developing a strategy on long-term plutonium management. The NFLA welcome the Government's decision to develop a medium and long-term strategy on the management of plutonium stockpiles.

Options for plutonium storage

DECC's discussion paper identifies three credible options for the management of the UK's plutonium stockpile. The NFLA view on which is preferred is as follows:

- **Reuse.** The NFLA believes that converting the existing stockpile of UK plutonium to Mixed Oxide (MoX) Fuel would require the construction of a new MoX fuel fabrication plant. This would **not** be an economic use of resources and there are many other more efficient climate abatement options. Spent MoX fuel would be a much more hazardous waste form to deal with than conventional spent fuel. Furthermore, the use of MoX fuels rather than as a waste product would mean that the UK fails to meet its non-proliferation objectives. It also involves quite unacceptable safety and security risks. The NFLA also perceives a potential threat to civil liberties, as it does not want to see large armed plutonium waste convoys being transported up and down the country between Sellafield and potential new MoX burning reactors.
- **Treat as waste.** This option would be the **NFLA's preferred option**. Unwanted plutonium should be blended down or otherwise immobilised and managed as waste. The material should remain under international safeguards until it can be shown that it would be impossible to reuse it. All immobilization options mentioned in the Nuclear Decommissioning Authority's (NDA) plutonium credible options paper should be investigate further and tested against environmental principles, including in particular proliferation resistance, and other criteria such as cost, dose levels to the workforce and the highest levels of health and safety. The NFLA acknowledges the difficulties for DECC and the NDA in this option, but feel that it is the most sensible and practical choice available.
- **Indefinite storage.** The NFLA accepts that there is a need to store plutonium stocks securely in the interim period before it can be treated as waste, and agrees with the discussion paper's assessment of the difficulties in doing this. The NFLA notes that the NDA's credible options paper notes

storage of plutonium at the Sellafield site until 2120, which gives adequate time to develop and improve waste treatment strategy. The NFLA believes that indefinite storage is not suitable as a long-term option, and that plutonium stocks should be placed beyond any possible future use, which could potentially include use as a fissile material in the production of nuclear weapons. The NFLA also believes that the creation of further plutonium stocks should be stopped as quickly as possible.

DECC involvement with stakeholders

The NFLA believe it is imperative that the Government does not identify any lead or preferred option for future plutonium management in the forthcoming consultation expected later this year. If the Government did take this course of action it would give relevant stakeholders the view that the Government had already made up its mind on the issue, with little value to engage in the main consultation exercise.

The NFLA actively took part in the DECC stakeholder dialogue in April 2009 and the NDA stakeholder dialogue on plutonium storage in May 2009 and asserted the views mentioned above. It would wish to see a consultation process that leaves options open as far as possible. This will allow for a fair and transparent process to take account of *all* stakeholder views.

Key factors in decision-making

The NFLA considers that, from the list presented in the DECC discussion paper, the following key factors are the most important, and should have the highest weighting, in any future ranking process:

- Safety and hazard.
- Security and proliferation resistance.
- Environmental impact, and social impact on local communities at any sites affected by the management option selected.
- Feasibility and technical viability.

In addition to the factors listed in the discussion paper, we think it is important to address the following factors when assessing options:

- ***Intergenerational equity:*** Any management option selected will have potential costs to future generations, who will not benefit from our generation's use of plutonium in the way that we have. As far as possible the legacy costs of managing plutonium should be paid up-front, rather than passed on to future generations.
- ***International safeguarding requirements:*** The NFLA believe that it must be possible to demonstrate that the UK remains within its international obligations to have stocks of plutonium available for inspection. This demonstrates that it is complying with safeguarding requirements until the material has been placed beyond use in such a way that is satisfied by international atomic regulators.
- ***Military use of plutonium:*** Depending on the progress of international disarmament negotiations, it will in due course be necessary to include

defence stocks of plutonium within the scope of the UK's plutonium management strategy.

The forthcoming plutonium strategy should not ignore or exclude the defence plutonium stockpile and should consider options for, in due course, bringing material held in the defence stockpile under international safeguards and eventual long term management alongside civilian stocks. These should then been brought under the jurisdiction of the NDA.

CoRWM consideration of plutonium management

The NFLA notes that many of the issues raised in the discussion paper have already been considered at length by the Committee on Radioactive Waste Management (CoRWM). The NFLA recommends that the team in DECC responsible for development of a long-term plutonium strategy should learn from, and build on, the work of CoRWM.

Future consultation

The NFLA would be grateful if DECC would keep it informed of future steps in development of the plutonium management strategy. The NFLA would be happy to be involved in any future stakeholder meetings on this issue and believe it would be useful to undertake such a meeting before a formal consultation report is issued.

Yours sincerely,



Bailie George Regan
Chair of Nuclear Free Local Authorities UK and Ireland

* The Nuclear Free Local Authorities are made up of over 75 councils from England, Scotland, Wales, Northern Ireland and the Republic of Ireland. Leading members include the cities of Manchester, Leeds, Glasgow, Edinburgh, Dundee, Cardiff, Bridgend, Dublin and Newry. Further details on its workstreams can be downloaded from <http://www.nuclearpolicy.info> or by contacting the NFLA Secretariat using the details at the top of this letter.