

Nuclear Free Local Authorities Secretariat

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NDA Business Plan Consultation
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Thornton Health
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Sent by e-mail to: facilitators@dialoguebydesign.com

Dear Sir / Madam,

NDA DRAFT BUSINESS PLAN 2009 / 2012

I write on behalf of the Nuclear Free Local Authorities (NFLA) to submit comments on the NDA's draft Business Plan.

The NFLA are a member affiliated organisation made up of over 70 Councils from England, Scotland, Wales, Northern Ireland and the Republic of Ireland. Their key objectives are:

- to consider and recommend action which can be taken by local authorities to promote the well being of their communities by reducing nuclear hazards in or potentially affecting their areas;
- to obtain and provide information and assistance to local authorities that can inform their understanding of the risks from nuclear hazards;
- to consider and recommend action which can be taken by local authorities and others to support and / or enable:
 - efforts to prevent the retention and proliferation of nuclear weapons and technology assisting that proliferation;
 - the safe phase-out of nuclear power in the shortest practicable time;
 - the minimisation of the production of all types of radioactive waste and materials resulting from military and energy applications of nuclear power and the minimisation of all risks to humans and the environment from such waste and other nuclear hazards;
 - energy conservation and the use of renewable sources of energy and other steps to reduce climate change without resort to nuclear power; and
 - sustainable economic development outside the nuclear sector.

Our comments on the Business Plan are as follows:

Consultation Period and Basis for Site Funding Allocations

The NFLA welcome the publication of business plans on three year rolling programmes from the NDA and it welcomes being provided with early sight of proposed activities brought forward in the draft plan. Reducing the consultation period from 12 to 6 weeks is of concern to the NFLA as it reduces the opportunity for a wide range of organisations (like the NFLA) to adequately consult its members.

The NFLA note that the plan contains a large amount of information on the allocation of funds to NDA owned sites. However, there is little explanation on the process for how the NDA concludes how each site is allocated funds and how it justifies these decisions. Each

site has detailed lists of tasks to be achieved over the next 3 years but the NDA does not clearly state how the allocation of funds will cover these duties or how additional funds will be attained if it is required. The NFLA would encourage the NDA to become more transparent in explaining its decision-making processes, particularly around the decision to prioritise funding on high hazard facilities at the expense of other sites.

NDA Funding and the Comprehensive Spending Review

The NFLA remain concerned on the potential contradiction of the NDA role in decommissioning civil public sector nuclear sites while maximising revenue from existing commercial assets and operations. The NFLA believes the NDA priority should be to decommission old nuclear facilities. It should not be creating yet more nuclear waste by continuing to operate commercial facilities.

The NFLA note the BERR report 'NDA Budgeting Shortfall 2007/08: Lessons Learned', which noted the 'inherent risks' in the way the NDA operates and that 'commercial income is volatile and over time will decline as sites progressively close and move into the decommissioning phase'. The NFLA requests that the NDA include in their business plan a more concise explanation of how its funding for decommissioning will remain comprehensive should problems occur in the commercial market – which may well be the case in the current situation of an international financial crisis.

Value Framework

The NFLA support the Nuclear Legacy Advisory Forum's (NuLEAF) response (of which a considerable number of NFLAs members are also involved in) on the NDA plan to refine the Value Framework to inform decisions about funding priorities (p11). The NuLEAF response noted the benefits of stakeholder participation for informing NDA decisions about prioritisation of spending across sites. The NDA appears to have not followed up this request to engage external stakeholders in the Value Framework process.

The NFLA would be keen to engage with the NDA as a legitimate stakeholder and would like clarification on how local authorities will be engaged in the Value Framework process. The NFLA would like clarification of NDA thinking on how its application of the Value Framework has impacted on 2008/9 funding allocations, and how it may do so in the future.

Nuclear New Build

The NFLA disagree with the UK Government's support for a new generation of nuclear power stations to help meet the UK's energy needs. The NFLA disagree with the NDA view to invite proposals for the use of its assets to support a new nuclear build programme. The NFLA notes that the NDA has conducted an extensive consultation with local communities surrounding its sites who expressed an interest in maintaining continued economic prosperity by developing a new build programme. The NFLA requests that the NDA conducts a wider consultation of communities in the region to seek a more balanced view on whether it should sell off land for new build. In any case, it is totally inappropriate for the NDA – an organisation supposedly dedicated to dealing with the nuclear waste legacy - to be planning to nominate its site for new reactors, and thus create yet more waste. (See Whitehaven News 23 Jan 2009 <http://www.whitehaven-news.co.uk/1.503574>)

Again, as noted above, the NFLAs feel there is a contradiction with the NDA decommissioning old nuclear sites while supporting new build. This is reinforced with the

lack of an agreed radioactive waste management policy and the potential creation of increased large amounts of new waste.

Best Practice Conferences

The NFLA welcome the proposal for a series of NDA best practice conferences. In order to encourage local authority involvement in such conferences the NFLA suggest that the NDA should consider the risk management and emergency planning process of developing its decommissioning work, the need for *regional* socio-economic studies of decommissioned sites and the implications of nuclear new build affecting the decommissioning planning application process.

Maximising Income from Sale of Assets

The NFLA reiterate the view that sale of assets should not be made to encourage a nuclear new build programme. However, the NFLA supports the sale of assets if it enables positive progress in dealing with nuclear legacy management programmes. The NFLA agree with the NuLEAF comment on the NDA business plan that this process is undertaken in an open and transparent manner through effective engagement with local authorities, including NFLA members. There should also be robust regulation of such sales and any sale of assets should have long-term benefits for decommissioning and not just short-term commercial benefit.

THORP, Magnox Reprocessing and Sellafield MOX Plant

The NFLA are firmly opposed to, and see no economic benefit from, the resumption of operations of the THORP plant or the Sellafield MOX Plant. The NFLA would welcome publication of the review of both plants as soon as possible.

The NFLA are concerned about the life extensions at the Oldbury and Wylfa nuclear power stations and the implications this may have on the closure date for the Magnox Reprocessing Plant. The NDA should report on the affect these life extensions will have on the amount of radioactivity of spent Magnox fuel. It sets a very poor precedent, in terms of developing openness, transparency and stakeholder dialogue when the results of a long dialogue process are repudiated without recalling the dialogue participants to offer an explanation. The BNFL Stakeholder Dialogue Discharges Working Group recommended the closure of the Magnox reprocessing plant at the end of 2012, along with the closure of Oldbury at the end of 2008 and Wylfa in March 2010 (as opposed to the current end of 2010).

The disposal of Very Low Level Waste (VLLW)

The NFLA would not like to see any significant increase in the transportation of any type of radioactive waste, which it believes are best dealt with at existing nuclear sites. The NFLAs would not wish to see 'flexible solutions' for disposal of VLLW in sites not familiar with the management of radioactive waste. This could potentially increase the risk burden to communities inexperienced in the management of such waste.


Socio-Economic Support and Development

The NFLAs consider the sum of just £10 million per year offered for socio-economic support to communities affected by decommissioning to be inadequate in dealing with the extensive issues required in areas lacking a wide range of alternative employment routes.

The current 'tight fiscal environment' encourages, rather than discourages, increased funding for affected communities.

The NFLAs would be happy to discuss any of these issues with the NDA at your convenience.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'SM' followed by a stylized surname.

Sean Morris
Secretary of Nuclear Free Local Authorities