

CoRWM Draft Recommendations

Comments by the Nuclear Free Local Authorities (NFLA) Steering Committee

Introduction

- 1.1 The NFLA Steering Committee has the support of 72 Local Authorities throughout the UK and Ireland including Glasgow, Edinburgh, Leeds, Manchester and the Greater London Authority. Some of its member authorities host nuclear sites, some are neighbouring authorities concerned about local economic, safety and environmental impacts of future legacy management, others are more widely dispersed and affected, for example, by nuclear transportation or historic, and potential future, nuclear facility siting issues. All are concerned about potential major nuclear accident consequences and co-operate in the collective community interest to: eliminate the major production cycles that generate radioactive wastes; phase out nuclear generating capacity; and ensure safe management of the radioactive waste legacy.

Comments

- 2.1 Broadly the CoRWM draft recommendations are supported. We agree that these recommendations should be received and considered by Government as an interdependent package and not unravelled.
- 2.2 Broadly the CoRWM public and stakeholder engagement process is supported. NFLAs urge CoRWM to recommend that this open and inclusive process continue at both a national and local level. Openness and transparency is vital to maintain public confidence.
- 2.3 However the current 4 week period for comment on draft recommendations is grossly inadequate (but we recognise that providing an opportunity to comment on the draft recommendations is itself novel, and we very much welcome this).
- 2.4 We reiterate our concern that communities near locations revealed on the Nirex long list in June 2005 should have been proactively engaged and given time to respond to CoRWM's consultation on management options. There is a danger that as the policy process moves to an implementation phase, a community may feel it had inadequate opportunity to engage earlier phases of the Managing Radioactive Waste Safely process and may challenge its legitimacy.
- 2.5 NFLAs also continue to be concerned that there is a danger, resulting from the current security environment, that information central to policy implementation may be withheld from public scrutiny on security grounds during later programme stages. NFLAs believe this could prove to be very damaging to public confidence and democratic accountability. CoRWM is urged to caution against it in its recommendations to Government.

- 2.6 We understand why CoRWM concludes that deep geological disposal is the best available option at this time for both ILW and HLW disposal but NFLAs will not support any deep geological disposal development until persuasive evidence is provided that the protection afforded to future generations will be at least as good as that afforded to today's generation by radiological protection standards. We urge CoRWM to set out the safety criteria it considers any design for a deep geological disposal facility should be capable of meeting. In keeping with its transparency policy CoRWM should also make explicit the demanding engineering requirements necessary in order to meet the safety criteria so that these may be openly and critically scrutinised by all stakeholders (local, national and international) in the next stage of MRWS.
- 2.7 We support an intensified programme of research and development into all aspects of both geological disposal, interim storage, and borehole disposal. In the considerable time that it will take for a siting process and for the design of a waste repository (or repositories) to be completed, technology may well have advanced far enough for other waste management solutions to be viable. Time may also change the attitude of future generations, who may feel it is appropriate to manage higher level radioactive wastes in a different manner.
- 2.8 We urge CoRWM to publish screening criteria for suitable geologies and, consistent with its open and transparent approach, publish a new UK map showing clearly the areas that it considers suitable for investigation. For example, CoRWM should be explicit about how it considers climate change predictions should be factored into site selection.
- 2.9 We urge CoRWM to provide a clear timeline for how long it expects the process of implementation of its recommendations to take effect.
- 2.10 A number of NFLA member authorities actively contribute to NuLeAF work and the NFLA Steering Committee supports the following NuLeAF observation that:

...a refinement of the options, to indicate those that are more favoured, would have been useful, and given stakeholders a focus on which to comment. We would advocate at least the following issues, to be considered by CoRWM in a more detailed interim storage recommendation;

1. *coastal erosion and sea level rise – and thus siting near the coast*
2. *security from terrorist attack*
3. *safety and robustness*
4. *prioritisation*
5. *community acceptability*
6. *planning system acceptability*
7. *regulator acceptability*
8. *number of stores needed – one centralised, several regional or local*
9. *transportation*

- 2.11 NFLAs support the CoRWM recommendations arising from its Implementation Report e.g. the requirement for partnership, community acceptance, engagement packages, community benefits and a right of withdrawal from negotiations about development of a facility. NFLAs consider a general right to withdraw (i.e. veto) should be retained up to the point where resources are committed for site development. Defined rights to withdraw should also be retained if, for example, a regulator considers a facility will not perform to design safety standards.
- 2.12 CoRWM should clarify that its implementation proposals apply to any community asked to accept an ILW interim storage facility with an operational life of 100 years, since this timescale will be viewed by a community as effectively permanent.
- 2.13 CoRWM should clarify that such storage is the 'default' option if geological disposal investigations fail. CoRWM should recommend that the NDA and BE jointly begin a process of public and stakeholder engagement on the existing licensed nuclear sites that should be designated for such ILW interim storage / default long-term storage.
- 2.14 To accommodate the potential for future default long-term storage CoRWM is urged to recommend ILW interim storage facilities be engineered to operate well beyond 100 years – should this be required.
- 2.15 NFLAs support NuLeAF observations that:
- Further information on packaging types and their lifetimes before failure would, again, have provided a focus for comment. We deem it important to avoid the need for re-packaging wastes, so a (rough) timetable of the implementation stages would be invaluable, as would a list of options and costs for handling, conditioning and packaging.*
- Progress with ILW conditioning currently remains slow - between 1998 and 2001 the proportion of conditioned waste rose by only 3% to 15%. There needs to be a review by Government of how the retrieval, conditioning and packaging of ILW – to put it into a passively safe storage form – can be substantially speeded up.*
- 2.16 We understand CoRWM does not wish to comment on whether reprocessed uranium, plutonium and spent nuclear fuel should be declared a waste in whole or in part but it is the NFLA view that these decisions impact on policy implementation and therefore CoRWM should at least state the process by which it considers decisions on the future of these materials should be taken.
- 2.17 We expect CoRWM to take a view on the reprocessing of spent fuel because this is a legacy waste issue. NFLAs have consistently opposed nuclear reprocessing for, amongst other

reasons, increasing radioactive waste by volume and adding complexity to the waste management process. We urge CoRWM to recommend against any further nuclear reprocessing.

2.18 Again, we support NuLeAF in its observation that:

Co-disposal of the different waste streams in the CoRWM inventory is not specifically mentioned, but seems the default option. If there is no information put forward concerning the number of repositories – one centralised, several regional local? – how can a meaningful debate be held? More information on how the different waste streams in the CoRWM inventory could be disposed of separately (or together) would also help to illustrate the options available.

We would like to see more clarification on the subject of short-lived ILW – is it viable (technically and cost effectively) for further work be done to separate out these particular wastes in order that they decay to LLW and decrease the radiological burden.

2.19 NFLAs expect CoRWM to set out its view on the costs and benefits of repositories engineered for immediate closure and those engineered for phased closure

2.20 Whilst CoRWM does not wish to express a view on the desirability or otherwise of new nuclear build it should at least acknowledge that opening a public debate about new build is likely to impact on the acceptability of its recommendations. Whilst CoRWM is at pains to draw a distinction between legacy wastes and those arising from any future programme, the NFLA Steering Committee does not believe such a distinction is likely to be drawn by the public. Like it or not, the new build debate is likely to affect the public acceptability of CoRWM's recommendations and add complexity to the implementation phase that follows.

Date: 25 May 2006

Contact: Stewart Kemp
Secretary
Nuclear Free Local Authorities
Town Hall
Manchester M60 3NY
Tel: 0161 234 3244
Fax: 0161 234 3379
Email: s.kemp@manchester.gov.uk