

Public Consultation on Policy for the Long Term Management of Solid Low Level Radioactive Waste in the United Kingdom

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

Introduction

- 1.1 The NFLA Steering Committee has the support of over 70 Local Authorities throughout the UK and Ireland including Glasgow, Edinburgh, Leeds, Manchester, the Greater London Authority, and Dublin. 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.
- 1.2 A number of the comments below underline points contained in the consultation submission by the Local Government Association's Nuclear Legacy Advisory Forum. Many NFLA member authorities contribute to the work of NuLeAF and significant areas of agreement therefore exist between NuLeAF and NFLAs on the approach towards radioactive waste management.
- 1.3 This response is confined to comments on headline issues and concerns raised by the policy consultation paper.

Comments

Guiding Principles for Waste Management Plans

- 2.1 The consultation paper refers (para.10 p12) to the principles that should guide the preparation of waste management plans, i.e. risk informed approach; waste minimisation (by activity and by volume); consideration of all practical option; presumption towards early solutions; proximity; and consideration of future climate change impacts. These principles are generally supported though they must be applied with the environmental protection principle of 'concentrate and contain'. The NFLA Steering Committee is concerned that using some options for LLW management could result in increased dilution and dispersal, increasing the potential for public exposures, and adding to the burden of radiological risk that is carried by society. Comments submitted to you by NFLA (Scotland) urging application of the precautionary principle in setting demanding risk targets are strongly supported.

Application of the Proximity Principle

- 2.2 The NFLA Steering Committee supports the proximity principle and the minimisation of waste transportation and would agree (p51) 'that the transportation of large volumes of low level waste over long distances to the facility at Drigg is undesirable and unnecessary for the safe management of many forms of LLW.' For this reason the NFLA Steering Committee opposed recent proposals for the transfer of LLW from Dounreay to Drigg. These objections were successful and LLW arising at Dounreay will continue to be managed on site.
- 2.3 Unlike other sites, Dounreay has always been unique in managing its LLW facilities. It is not policy to dispose of LLW generated off the Dounreay site, to the proposed new facility there.
- 2.4 The NFLA Steering Committee recognises that applying the proximity principle with future decisions on nuclear site end states, and the timescales for achieving agreed end states, is likely to result in some 'regionalisation' of LLW waste management facilities probably centred on licensed nuclear sites with better containment characteristics.

Policy Implementation Principles

- 2.5 The NFLA Steering Committee considers that the 'implementation' principles identified through the work of NuLeAF and CoRWM should be applied in any process to identify long term management facilities for low level radioactive wastes.

Drigg

- 2.6 The consultation paper refers (Box 1 p7) to the 'permanent disposal' of LLW at the site near Drigg. During the recent public consultation on authorisations for continued disposal at the site, a number of local authorities called for the site status to be reviewed in the light of its forecast vulnerability to future coastal erosion. The NFLA Secretariat submitted to the Environment Agency consultation on the future authorisation of the LLW facility near Drigg, that the site be redesignated for waste storage, not disposal.

Incineration & Landfill

- 2.7 The consultation paper refers (para.8 p8) to the need for greater consideration of 'other options' for the long term management of LLW. The NFLA Steering Committee does not consider that incineration or landfill disposal can properly be described as 'long term management methods'. Effectively they reduce or surrender management control.
- 2.8 The consultation paper refers (Box 1 p7) to incineration as a means of LLW 'disposal'. Generally incineration of LLW is not acceptable to the NFLA Steering Committee because it disperses pollution to the environment. The NFLA Steering Committee support the environmental principles of concentration, isolation and containment of radioactive wastes. Incineration is a practice that is at best tolerated by communities and, therefore, many local authorities could be

expected to be concerned that any new or increased incineration for radioactively contaminated combustible materials could compromise existing usage.¹

- 2.9 The NFLA Steering Committee considers that, like incineration, local landfill is at best tolerated by local communities and, therefore, many local authorities will likely react with concern to any proposal for new or increased usage to bury low level radioactive wastes. In 1995, the then Department of the Environment's review of Radioactive Waste Management decided not to encourage greater use of landfill because of opposition from local authorities and the public. The Environment Agencies (EA and SEPA) have indicated an unwillingness to allow this practice to be extended. The LLW consultation paper itself acknowledges (p41) that Council Directive 99/31/EC is likely to result in 'fewer landfills available'.

'In situ' Disposal

- 2.10 It is accepted that the application of environmental protection principles (e.g. 'proximity' 'containment' 'Best Practicable Environmental Option' 'Strategic Environmental Assessment' 'transportation minimisation') at sites with good containment characteristics may result in decisions to retain large volumes of radioactively contaminated soils 'in situ'.

Very Low Level Waste

- 2.11 Comments by NFLA (Scotland) urging a full explanation of the justification for the new level of radioactivity permitted in VLLW is strongly supported.

Recycling

- 2.12 The consultation paper refers (para 19 p25) to 'increased re-use and recycling, and the opening of markets for recycled wastes'. NFLA concern about the health and environmental impacts of recycled contaminated metals is a matter of public record². The Health and Safety Executive has considered options for controlled contaminated metals smelting as a means of volume reduction, and controlled reuse (e.g. within the radioactive waste management industry), and this is likely to be more publicly acceptable.

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Contact: Stewart Kemp

¹ Public opposition has prevented the commissioning of LLW incinerators at Bradwell and other nuclear sites. This has resulted in the near cessation of incineration operations by the nuclear sector, although some forms of low activity waste, for example contaminated waste oil, are still transferred to commercial incinerators, and a new incinerator is planned for the Dounreay nuclear site for contaminated oils and solvents.

² **Radioactive Scrap Metals** Nuclear Free Local Authorities Report, 28pp, pub: July 2000

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