



Nuclear Free Local Authorities Steering Committee

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NFLA Scotland Media release - for immediate release, 11th August 2014

NFLA Scotland raises concerns over proposed changes to radioactive waste authorisations, which will lead to more incineration of waste and more road transports of waste

The Nuclear Free Local Authorities (NFLA) Scotland Forum today publishes its model response and core submission (1) raising concerns over requested changes to radioactive waste transfer authorisations at the Scottish nuclear power stations of Hunterston and Torness. (2)

EDF is requesting of the Scottish Environment Protection Agency (SEPA) to change the waste authorisations as follows:

- EDF wants to be able to transfer Low Level Radioactive Waste (LLW) to any authorised site in Britain rather than just locations specified by SEPA. The likely new locations are not specified in the consultations, but will probably include sites with incinerators and metal treatment facilities.
- At the moment only LLW can be transferred off-site. EDF Energy also wants to be able to transfer certain types of Intermediate-Level Waste (ILW) to a list of incinerators (none of which are in Scotland) and metal treatment facilities, including Nyköping in Sweden (where contaminated metal from Rosyth has been sent), Krefeld in Germany, Lillyhall in Cumbria, and a facility in Tennessee.
- Radioactive waste transfers are currently subject to annual activity limits set for individual radionuclides or groups of radionuclides. EDF Energy wants these restriction removed. It also wants any restrictions on physical or chemical characteristics removed. This would allow EDF Energy to send oils, classified as ILW, for incineration, and for wet wastes such as sludges and resins to be transferred off-site for treatment and disposal.
- EDF Energy also wants permission to transfer wastes from other EDF power station sites to Torness and Hunterston for interim storage; loading of containers and onward transfer. Crucially the application says "*there will be no processing or treatment of waste*" that has been transferred to Torness or Hunterston from another site.

In the NFLA's view this EDF application, if approved by SEPA, seems likely to lead to the further incineration and recycling of LLW. NFLA does not support this, believing it to be a breach of the "*concentrate and contain rather than dilute and disperse principle*".

NFLA is in particular concerned about the proposal to allow the transfer of ILW for the purposes of incineration and recycling. ***This could obviously mean much higher levels of radioactivity discharged into the environment as a result.*** And even more controversially, and running counter to current Scottish Government radiation waste policy in the view of NFLA, are plans to transfer ILW between the Hunterston and Torness sites. ***NFLA are concerned that the Scottish Government has made no comment whatsoever on EDF's proposals around ILW.***

NFLA's other key conclusions to this consultation include:

- NFLA does not favour waste transfer whether for incineration, so-called 'recycling' or transfers between Torness and Hunterston. It rather favours on-site storage and the application of the proximity principle (waste should stay close to its point of origin in the NFLA's view).
- NFLA is particularly concerned about proposals to transport intermediate level waste by road between Torness and Hunterston, unnecessarily increasing the risk of accident. There will be no processing or treatment of waste transferred between the two sites, which again runs counter to Scottish Government radioactive waste management policy.

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- From the consultation documents provided by SEPA it is not possible for NFLA to tell which wastes of what activity and volume will be sent for incineration, which will be sent for recycling and which will be transported between Torness and Hunterston. To the NFLA, this is unacceptable.

NFLA Scotland Convener, Councillor Bill Butler said:

“NFLA Scotland are concerned that Scottish Government radioactive waste policy is not being adequately adhered to in EDF’s proposals for changes to its waste authorisations contained in this SEPA consultation. If accepted by the regulator, Scotland would see an increase of the number of new transports of radioactive waste, adding to those already taking place from Dounreay, with all the unnecessary risks that entails. I urge the Government to formally comment on why it would allow some of these changes to go ahead, when it runs counter to its own waste management policy. The data provided is also incomplete and the proximity principle is being largely ignored. EDF, SEPA and the Scottish Government need to reconsider these flawed proposals.”

Ends

For more information please contact Sean Morris, NFLA Secretary on 0161 234 3244 or Pete Roche, NFLA Scotland Policy Advisor on 0131 444 1445.

Notes for editors:

- (1) The NFLA Radioactive Waste Briefing providing its model submission to the SEPA radioactive waste consultation is attached with this media release and will go on the NFLA website.
- (2) The SEPA consultation is available at http://www.sepa.org.uk/about_us/consultations.aspx and the closing date for consultation responses in the 3rd October 2014.

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