

# Nuclear Free Local Authorities **RADIOACTIVE WASTE POLICY**

## **Briefing No.68 – NDA Draft Business Plan 2017 - 2020**

Prepared for NFLA member authorities, February 2017

### NFLA Submission to NDA Draft Business Plan 2017 – 2020 consultation

#### i. Preamble

This edition of the NFLA Radioactive Waste Policy Briefing gives members the Secretariat's response to the Nuclear Decommissioning Authority's (NDA) Draft Business Plan for the period 2017 to 2020. It has been developed by the NFLA Secretary. The submission was sent in before the February 3<sup>rd</sup> deadline. The NDA Business Plan gives high level information on the NDA budget plans and key priorities over the next 3 years and beyond. It is a useful engagement exercise to comment on the core parts of the NDA's programme.

#### 1. Overview of NDA spending commitments to 2020

NDA has secured an annual budget of over £3 billion of public money to spend on its decommissioning and waste management programmes. NFLA welcomes that this budget has been maintained and for Government financial commitment remaining robust and strong for NDA activities. NFLA notes that the income generation of the NDA portfolio is inevitably going to decline quite markedly in the near future as generation opportunities decline and decommissioning work increases. NFLA urges the NDA to discuss in more detail how its overall budget will be maintained over the next decade as this transition speeds up.

NFLA welcomes the closure of the THORP and Sellafield Magnox reprocessing facilities by the end of 2018 and 2020 respectively. NFLA never supported the development of either facility and believe them to have been a costly expensive policy mistake. It is concerned that the amount of orders for both facilities can be dealt with in the remaining time planned for them, and calls on the NDA to outline a clear timetable on how it will achieve these targets on time. NFLA will continue to engage with NDA on this matter.

There are wider discussions ongoing with government and regulatory agencies over how the 'care and maintenance' of decommissioned reactors will be completed. NFLA is taking an active role in this discussion, and asks the NDA to provide detailed public information on its three 'Lead and Learn' sites to provide useful ways to ensure this process is dealt with timely and efficiently, with the support of the local community and local authorities.

NFLA remains disappointed that the NDA does not put within its Business Plan a clear set of environmental principles to underpin its activities.

NFLA's long-standing environmental principles on waste and decommissioning are:

- **The idea that radioactive waste can be "disposed" or be rejected in favour of radioactive waste management;**
- **Any process or activity that involves new or additional radioactive discharges into the environment be opposed, as this is potentially harmful to the human and natural environment;**
- **The policy of 'dilute and disperse' as a form of radioactive waste management (i.e. discharges into the sea or atmosphere) be rejected in favour of a policy of 'concentrate and contain' (i.e. store safely on-site);**
- **The principle of waste minimisation be supported;**
- **The unnecessary transport of radioactive and other hazardous wastes be opposed;**

- **Wastes should ideally be managed on-site where produced (or as near as possible to the site) in a facility that allows monitoring and retrieval of the wastes.**

NFLA remains concerned that the NDA has been significantly increasing transports of radioactive waste within the current stage of activity, particularly from Dounreay to Sellafield. It seeks the NDA to review this policy and consider developing a waste store for such material at Dounreay, rather than continuing with rail, sea and now air transports, which are hazardous and NFLA believes often unnecessary.

NFLA notes in the Business Plan that there is support for the Government's Nuclear New Build agenda and remains concerned that the importance of dealing with the nuclear legacy may be downplayed in favour of new nuclear build. The NDA should resist attempts to join as a 'cheerleader' for new nuclear, which has major financial problems at present. No significant part of the NDA budget should be spent on new build activity.

It is reasonable for the business plan to remain high level in nature, but it does need to engage with NFLA and other groups on the detail of this in appropriate forums.

## 2. Funding

NFLA shares the concerns of NuLEAF that the budget for socio-economics is reducing in the next financial year from £32 million to £31 million. This is a retrograde and blinkered decision and goes against the claim by the NDA that such matters remain a core priority. This should be reconsidered.

NFLA notes the budget for INS will also reduce from £118 million to £63 million and would like to query why this is the case. There are plans to transport some Dounreay waste to Sellafield by sea – a policy the NFLA opposes – and therefore NFLA would like to know how such major reductions in funding affects the maintenance of a fleet that is already in our view too old and in need of replacement.

NFLA has been concerned with NDA stakeholder engagement in general and would like to see increased resources put into this area. NFLA believes the NDA does not adequately engage with groups that are sceptical of nuclear power and which provide more challenge to the nuclear industry. NDA should consider not just funding NuLEAF and SCCORS, but considering its funding of engagement with other groups to ensure improved policy processes and to take on board more challenging views to its policies.

## 3. Site Summaries

NFLA remain particularly concerned about decommissioning of the Sellafield site. NFLA is pleased with improvements in some areas, and in speeding up some decommissioning activity. The new management model does appear to be providing some important improvements.

NFLA remains of the view that the key issues raised by a whistleblower in the BBC 'Panorama' documentary have not been sufficiently dealt with.

These include:

- 'Panorama' found parts of the Sellafield site regularly have too few staff to operate them safely. During one quarter this occurred **19 times**.
- Radioactive materials like uranium and plutonium have been stored in degrading plastic bottles in cupboards for a number of years. Only now are they beginning to be dealt with.
- The whistle-blower (a former senior manager at Sellafield) said his biggest fear was a fire in one of the nuclear waste silos or one of the reprocessing plants, saying: ***"If there is a fire there it could generate a plume of radiological waste that will go across Western Europe."***
- Parts of the site are "dangerously run down" and officials from its former managing company Nuclear Management Partners raised concerns some sites could collapse over time, creating a potential environmental catastrophe and a dangerous radioactive release.

NFLA welcomes the invitation by NDA given to Newry, Mourne and Down Council to visit the Sellafield site and hope that can be expedited. It hopes the issues raised by the documentary are being included in Sellafield's remediation plan over the next 3 years.

NFLA shares NuLEAF's concern over local authority dissatisfaction with Magnox engagement on the management of Intermediate Level Waste (ILW) and Fuel Element Debris (FED). It is concerned that there will now be movements of waste to a single site, when such waste should be stored at the site of origin. NFLA wants to see substantial improvement on this issue and a review of this decision.

NFLA encourages NDA to work more pro-actively with it, rather than just with NuLEAF and SCCORS (who NFLA work with). It calls on NDA to consider developing a Forum with NFLA and other groups that provide it with a much greater level of challenge, as currently exists with BEIS and the ONR.