

# Nuclear Free Local Authorities Secretariat

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Chair: Bailie George Regan Secretary: Sean Morris



Dean Gallacher  
Department of Energy and Climate Change (DECC)  
3 Whitehall Place  
London SW1A 2HD

30<sup>th</sup> November 2009

Dear Mr Gallacher,

## Long Term Plutonium Management: Decision Methodology and Timetable Discussion Paper

### Comments from Nuclear Free Local Authorities

The NFLA are grateful for the opportunity to comment on the second DECC discussion paper covering decision methodology and a timetable for decision-making for long-term plutonium management strategy. The NFLA welcome the Government's decision to develop a medium and long-term strategy on the management of plutonium stockpiles.

#### 1. Options for plutonium storage

As noted in the last DECC discussion paper, three credible options for the management of the UK's plutonium stockpile is noted. It is important to reiterate the NFLA view on which is preferred as follows:

- **Reuse.** The NFLA believes that converting the existing stockpile of UK plutonium to Mixed Oxide (MoX) Fuel would require the construction of a new MoX fuel fabrication plant. This would **not** be an economic use of resources and there are many other more efficient climate abatement options. Spent MoX fuel would be a much more hazardous waste form to deal with than conventional spent fuel. Furthermore, the use of MoX fuels rather than as a waste product would mean that the UK fails to meet its non-proliferation objectives. It also involves quite unacceptable safety and security risks. The NFLA also perceives a potential threat to civil liberties, as it does not want to see large armed plutonium waste convoys being transported up and down the country between Sellafield and potential new MoX burning reactors.
- **Treat as waste.** This option would be the **NFLA's preferred option**. Unwanted plutonium should be blended down or otherwise immobilised and managed as waste. The material should remain under international safeguards until it can be shown that it would be impossible to reuse it. All immobilization options mentioned in the Nuclear Decommissioning Authority's (NDA) plutonium credible options paper should be investigate further and tested against environmental principles, including in particular proliferation resistance, and other criteria such as cost, dose levels to the workforce and the highest levels of health and safety. The NFLA acknowledges the difficulties for DECC and the NDA in this option, but feel that it is the most sensible and practical choice available.
- **Indefinite storage.** The NFLA accepts that there is a need to store plutonium stocks securely in the interim period before it can be treated as

waste, and agrees with the discussion paper's assessment of the difficulties in doing this. The NFLA notes that the NDA's credible options paper notes storage of plutonium at the Sellafield site until 2120, which gives adequate time to develop and improve waste treatment strategy. The NFLA believes that indefinite storage is not suitable as a long-term option, and that plutonium stocks should be placed beyond any possible future use, which could potentially include use as a fissile material in the production of nuclear weapons. The NFLA also believes that the creation of further plutonium stocks should be stopped as quickly as possible.

## **2. DECC preliminary view and timing of decision**

- 2.1 In section 3.3 of the discussion paper DECC clearly state that none of the above options have been worked up in complete detail, in particularly the options around indefinite storage - which DECC refers to as 'disposal options'. Yet by section 4.1 DECC has concluded that the Government considers that focussing its efforts on a preliminary view of the most appropriate long term solutions will give the best prospects towards a final long-term solution. The jump from one to the other is not adequately explained. DECC need to explain how they have come to the view that there is a need to put forward its preliminary opinion.
- 2.2 The NFLA believe that DECC should not be giving a preliminary view until the above options have been considered in greater detail one by one. Furthermore the NFLA would like to ask DECC to clarify how their 'initial screening process' mentioned in section 3.8 differs from the NDA credible options paper – there is absolutely no explanation of this process in the paper, so it is impossible for the NFLA to take a view on it. Where there is such a lack of information or scientific and technical uncertainty then DECC should clearly indicate this during the consultation and the decision-making process.
- 2.3 The third phase of a decision by the Justifying Authority (mentioned in the consultative paper) should consider the ongoing tension between the Secretary of State being the Justifying Authority when the Government may have already given its view. This has been a major concern to the NFLA in the current Justification decision on new nuclear build in which the Secretary of State is the Justifying Authority and yet has made many consistent positive public announcements prior to the consultation in favour of new nuclear build. This creates obvious issues of whether the decision is neutral and legitimate.
- 2.4 Should the Government give a preliminary view on plutonium storage the same concerns that it has now made up its mind without adequate consultation will be an inevitable conclusion and should therefore be avoided in the view of the NFLA.
- 2.5 As noted in the NFLA response to the first consultation paper and to reiterate again, the NFLA wish to see a consultation process that leaves options open as far as possible. This will allow for a fair and transparent process to take account of *all* stakeholder views.

## **3. Key issues in decision methodology**

- 3.1 Again, as noted in our last response, the NFLA considers that the following key factors are the most important, and should have the highest weighting, in any future ranking process:

- Safety and hazard.
- Security and proliferation resistance.
- Environmental impact, and social impact on local communities at any sites affected by the management option selected.
- Feasibility and technical viability.

3.2 The NFLA feel a full and open consultation process should be undertaken by DECC, with a structured series of public stakeholder dialogue events. The NFLA suggest that DECC speak to CoRWM on how they undertake public stakeholder engagement and the Environment Council, who provide facilitation to the NDA stakeholder dialogue. The discussion which took part in the first phase of CoRWM's work deliberately left all options open, ensured wide-ranging fair discussion and built trust and confidence in its work. The NFLA encourages DECC to use a similar approach.

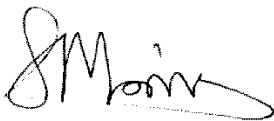
3.3 The NFLA would also like to point out that decisions made in the past by 'expert' technical opinion in nuclear policy matters have often been flawed and led to costly mistakes. Full public engagement with a wide range of interest groups from across society, using accessible and transparent language, will provide a greater opportunity for a conclusion that has wide acceptability.

#### **4. Conclusion**

4.1 The most important point which the NFLA wish to make about this discussion paper is that DECC should not put forward any preliminary view but simply provide a status report, based on the outstanding work which needs still to be undertaken – preferably by the NDA. After this is achieved DECC should then come back with a more considered response in order to allow for more informed stakeholder engagement. The NDA's credible options report provides a substantial list of future research which is still required.

4.2 The NFLA remains keen to be involved in all future stakeholder engagement on this important issue and wishes to be kept informed by DECC of future steps in development of the plutonium management strategy.

Yours sincerely,



Sean Morris  
Secretary of Nuclear Free Local Authorities UK and Ireland

\* The Nuclear Free Local Authorities are made up of over 70 councils from England, Scotland, Wales, Northern Ireland and the Republic of Ireland. Leading members include the cities of Manchester, Leeds, Glasgow, Edinburgh, Dundee, Cardiff, Bridgend, Dublin and Newry. Further details on its work programme can be downloaded from <http://www.nuclearpolicy.info> or by contacting the NFLA Secretariat using the details at the top of this letter.