NFLA submits views on options for the storage of intermediate level radioactive waste in central and southern Scotland

The Nuclear Free Local Authorities (NFLA) has developed a model submission response for its members to respond to the Nuclear Decommissioning Authority's (NDA) public consultation on options for dealing with intermediate level radioactive waste in central and southern Scotland (1). By its definition such waste lies between the categories of 'low level' waste (such as clothing used at nuclear sites) and 'high level' waste materials used in the civil and nuclear reactor programme.

As with all its responses to radioactive waste consultations, the NFLA advocate that the NDA should start from a clear set of environmental principles. The NFLA's agreed principles are (2):

- the idea that radioactive waste can be "disposed" of 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.

The NDA consultation considers a variety of options about moving waste within the Hunterston nuclear reactor facility and considers the potential for movements of waste in other sites, such as at the Torness nuclear reactor facility and the Rosyth nuclear submarine site.

The NFLA makes the following main conclusions to this consultation:

- The consultation paper is not written in a way which makes it accessible even to informed stakeholders and members of the public.
- This consultation could have been used as a valuable opportunity by the NDA to explain its thinking on the next steps to be taken on dealing with graphite waste at Hunterston following the cancellation of the Graphite Pathfinder Project, and to explain its thinking on near surface 'disposal' of intermediate level waste.
- The NFLA reiterates its environmental principle arguing against so-called 'disposal' of waste whether near-surface or deep.
- The NFLA also argue against the current way in which the 'waste hierarchy' is used by the NDA, because it leads to the dilution and dispersal of radioactivity rather than its concentration and containment.
- The NDA should drop altogether, rather than postpone, consideration of the storage of Torness waste at Rosyth, and consideration of transporting Torness waste to the Hunterston store.

NFLA Scotland Forum Convener Councillor Fariha Thomas said:

"The NFLA is disappointed with the lack of clarity in this consultation and its inaccessibility to the lay reader. If the NDA want meaningful engagement with stakeholders they need to use language and concepts that explain better these complicated but crucial decisions on how to store radioactive waste. The NFLA strongly argue that by using environmental principles a conclusion of storing waste..."
safely on site is the preferred option for Scottish radioactive waste, rather than unnecessary transports between nuclear sites.”

Further information
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Notes to Editors:
(1) NFLA Radioactive Waste Briefing 35 on the NDA consultation is attached with this briefing.
(2) The NFLA’s agreed set of environment principles were agreed at its AGM in Hull in 2004.