



Nuclear Free Local Authorities Steering Committee

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NFLA Media release - for immediate release, 14th February 2012

NFLA submits its response to MOD on submarine dismantling – apply environmental principles and don't build any more submarines

The Nuclear Free Local Authorities (NFLA) has submitted to the Ministry of Defence (MOD) its formal response to the public consultation on how to dismantle redundant nuclear submarines and what to do with the intermediate level radioactive waste that arises from them. The response has also been developed into a NFLA Radioactive Waste Briefing for its member authorities (1).

The MOD has been developing its policy on how to dismantle redundant nuclear submarines for a number of years now. The NFLA has taken an active part in these discussions, with NFLA staff and elected members attending all meetings of the Submarine Dismantling Project Advisory Group, and the NFLA Secretary also attending sub-groups to encourage an open and transparent consultation process. The NFLA welcomes the spirit of openness with the MOD in this area, which compares quite markedly to the secrecy and inadequate public discussion over radioactive contamination at the Dalgety Bay site, just a few miles from the Rosyth base in Fife (2).

The key points of the NFLA submission are:

- It is incumbent that the Ministry of Defence deal with this major radioactive waste legacy. By implication this means **not building new nuclear submarines** to increase the waste burden on future generations.
- The radioactive waste resulting from the redundant submarines needs to be dealt with and not left for future generations to have to consider.
- The NFLA is disappointed that the MOD has not consistently applied a clear and concise set of environmental principles, such as the 'As Low as Reasonably Achievable (ALARA)' principle for worker doses, the proximity principle and the Best Available Techniques (BAT), within this consultation (3).
- The NFLA has put forward a set of environmental principles to the MOD. In the context of this consultation, and in reference to these principles, the NFLA believe the storing of the intact reactor compartments above ground in safe and secure locations at Rosyth and Devonport appears to be the best option.
- However, the highly built-up nature of both the Rosyth and the Devonport sites creates real issues over the management of intermediate radioactive waste on each site, as the public views from local referendums have emphasised. Though not a part of the main consultation, it is clear that the issues around radioactive waste storage from the submarines will have to be discussed sensitively at a future date with the Councils and the local communities around both sites. Similarly, if other Nuclear Decommissioning Authority (NDA) or MOD sites are chosen as the eventual location for storing such waste then the relevant local Councils and communities should be the focus of open and transparent discussions (4).
- The Highly Enriched Uranium (HEU) used in submarine reactor fuel is a major proliferation concern. UK and U.S. submarine reactor fuel uses uranium enriched to over 90% U-235 – basically weapons grade uranium. It is essential that HEU is removed from all nuclear reactor fuel cycles as soon as possible.
- The 2010 Radioactive Waste Inventory has estimated the quantity of waste produced up to 2100 assuming a continuing nuclear-powered submarine programme. (5) So there is no reason to rush into the 'disposal' (for the NFLA monitorable and retrievable storage) of waste from decommissioned submarines if it is assumed that this waste will continue to arise until at least 2100. Waiting for, say, another hundred years before deciding whether or not to cut up the reactor compartments would give time for further radioactive decay to take place.

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The NFLA has provided expert advice and assistance to its member authorities during the development of its model response, including Fife Council and Edinburgh City Council.

NFLA Chair Councillor Brian Goodall said:

“The NFLA submission to the MOD’s consultation on what it should do with dismantling redundant nuclear submarines provides a detailed and reasonable way forward. We always start from the premise that we shouldn’t be looking to create yet more radioactive waste, so there should be a commitment from MOD to build no more submarines. We encourage the MOD to base its future decisions on the environmental principles that lay very much at the heart of NFLA’s radioactive waste management strategy. As the MOD have de-coupled the separate and critical decision about where radioactive waste from a dismantled submarine will be stored; we urge it to sensitively consider the real issues around storage at either Rosyth and Devonport and discuss further with the NFLA and local communities to come forward with a sensible and practical solution. Moving the waste to a future deep-underground facility is not a solution we would accept.”

Ends

Further information - Sean Morris, NFLA Secretary 0161 234 3244 or 07771 930186.

Notes to editors:

- (1) The NFLA Radioactive Waste Briefing providing a model response to the MOD Submarine Dismantling consultation is attached with this media release.
- (2) The NFLA is pursuing the major local concerns around the radioactive contamination of part of the beach at Dalgety Bay in Fife with the MOD, SEPA and the Scottish Government. A response to correspondence with the MOD and the Scottish Government is available and a meeting with Scottish Government officials and the NFLA will take place shortly.
- (3) The NFLA’s agreed set of environmental principles, decided at its AGM in Hull in 2004, 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;
- (4) As noted in the MOD Submarine Dismantling consultation, it is currently discussing with the NDA over potential sites and waste solutions to the storing of intermediate level radioactive waste from the submarines:
<http://www.mod.uk/DefenceInternet/AboutDefence/CorporatePublications/ConsultationsandCommunications/PublicConsultations/ConsultationOnTheSubmarineDismantlingProject.htm>
- (5) See the NDA website link:
<http://www.nda.gov.uk/ukinventory/documents/Reports/upload/2010-UK-Radioactive-Waste-Inventory-Summary-of-the-2010-Inventory.pdf> page 7.

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