NFLA Policy Briefing
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NFLA Response to the Consultation by the Nuclear Decommissioning Authority on its 2022-25 Draft Business Plan

1. Introduction

On 6 December 2021, the Nuclear Decommissioning Authority (NDA) published its Draft Business Plan for 2022-5. The NDA is the body responsible for the decommissioning of redundant nuclear power plants and the clean-up of sites within the UK.

The Draft Business Plan sets out what the NDA’s main activities will be over the next 3 years, and the funding available for them.

The NDA’s current plans indicate it will take more than 100 years to complete 'our core mission of nuclear clean-up and waste management'; with a closing date to all work of 2125.

The NDA currently employs 17,500 staff. Clean-up operations cover 17 nuclear sites on 1,043 hectares of land with over 800 buildings. The agency’s budget for 2022-3 will be almost £3.65 billion, of which over £2.8 billion will come from the UK taxpayer and over £800 million from commercial operations.

The Business Plan can be found at:


The NDA invited comments from interested parties by 4pm 31 January. Following review, the Final Business Plan will be published in March.

2. The NFLA Response

The NFLA response to the consultation included comments on:

- Group structure
- Spent fuels
- Nuclear materials
- Integrated waste management
- Diversity and inclusion
- Cyber and physical security
- Community and public engagement
- Sustainability
- International relations

THE LOCAL GOVERNMENT VOICE ON NUCLEAR ISSUES: 41 YEARS WORKING FOR A RENEWABLE, SAFE & PEACEFUL FUTURE

C/o Nuclear Policy, Level 3, Town Hall Extension, Manchester, M60 3NY
Tel: 0161 234 3244 E-Mail: richard.outram@manchester.gov.uk Website: https://www.nuclearpolicy.info
Dear NDA Colleagues,

**Re. NFLA RESPONSE TO NDA 2022-25 BUSINESS PLAN CONSULTATION C/D 31.1.22**

I am writing to you as Chair of the Nuclear Free Local Authorities (NFLA) network with the NFLA’s response to the consultation on the 2022-25 draft NDA Business Plan.

Whilst the NFLA remains inplacably opposed to new nuclear development within the British Isles, member authorities are pragmatic and recognise that, as a consequence of the folly of the post-war pursuance of nuclear power and the acquisition of nuclear weapons, the UK Government, and ultimately the British taxpayer, is faced with the costly and deadly legacy of decommissioning redundant nuclear power stations and sites which will take over a century still to complete and the management of toxic nuclear waste for millenia.

In that the NDA is the primary authority charged with achieving this, the NFLA main interests in examining the proposed NDA business plan are to ensure:

- The decommissioning of sites and the transportation, storage and management of waste is carried out safely and efficiently, without risk – in so far as this can be mitigated within the civil nuclear field – to employees, contractors and the general public or damage to the natural environment.
- New technology, especially in the field of robotics, is utilised to improve efficiency and mitigate risk.
- Local people and contractors are wherever possible prioritised in being offered employment or business at sites being decommissioned. The NFLA recognises that the closure of a nuclear plant represents a significant economic loss to the host community and would urge the NDA to mitigate the impact by actively re-engaging local former plant employees, at all levels, and local contractors on the decommissioning work.
- Operations at nuclear sites, and in conjunction with nuclear waste management, are subjected to proper scrutiny and challenge by local elected members, interest groups and the general public through effective and representative stakeholder groups and by outside bodies with an especial interest in civil nuclear matters (such as the NFLA and Nuleaf).
- Sustainability in current and future operations, including plans for the use of ‘dedesignated’ land to generate power using truly green renewable energy technologies, such as solar, wind, green hydrogen, and tidal.

We welcome the proposals to streamline the business into four pillars, particularly the merger of operations in transport and waste. The NFLA recognises the advantages of the new arrangements in:

- Providing greater opportunities for staff to share their specialist knowledge and expertise within a larger group; we believe that this has the potential to improve safety and efficiency.
• Improving staff retention by providing more openings for career advancement or divergence; so
retaining and enhancing their unique skill sets, which are, in many cases, peculiar to this particular
field of engineering and science.
• Reducing bureaucracy within the group. Not only should this realise a significant ongoing cost
saving that can be passed onto the over-burdened British taxpayer, but it should also make it
easier for outside bodies with an especial interest in civil nuclear matters (such as the NFLA and
Nuleaf) to interact with the NDA.

Page 21 – Spent Fuels

The NFLA was disappointed that Magnox reprocessing at Sellafield did not end in 2020 in accordance
with the original OSPAR Sintra resolution to reduce radioactive emissions into the North East Atlantic
to close to zero by 2020. We note that closure has now been further delayed, because of Covid, to this
year. However, the Business Plan gives no indication of a more precise closure date. NFLA would
encourage the NDA to close this plant as early as possible in 2022, rather than allowing it to continue
causin the unnecessary pollution of the North East Atlantic until the end of the year.

Page 23 – Nuclear Materials

We note on pages 23 and 60 that the NDA is still considering the reuse of plutonium. NFLA is strongly
opposed to this and would encourage the NDA to impress of the Government to need to treat
plutonium as a waste form and work towards placing the UK’s huge stockpile beyond use.

Page 24 – Integrated Waste Management

In view of the emphasis given in this draft Business Plan to what the NDA calls its ‘Integrated Waste
Management Strategy’ we would like to res-state something we said in response to last year’s draft
Business Plan:

‘In the absence of agreement between the NFLA and the NDA on nuclear waste management in
general and the waste hierarchy in particular, we think it is incumbent on the NDA to provide
stakeholders at each of its sites with an inventory of waste already present and which will be produced
during the decommissioning process along with its likely proposed destination.

‘This allows for easy understanding and comparison to the NFLA demand that if any part of a nuclear
site is proposing to allow unrestricted use, it must be able to show that doses to members of the public
will be of the order of 0.01mSv or less per year.

‘This process should allow local authorities which are expected to host waste management facilities
off-site – such as landfill sites, and local authorities on transport routes - to be part of the active policy
conversation.’

Page 26 – Diversity and Inclusion

The NFLA welcomes commitments to diversity and inclusion within the workforce, but would also
welcome further clarification within the final business plan on the support made available to staff losing
employment from a decommissioned plant to enable them to be either reengaged in a role supporting
the decommissioning process or find alternate employment. Likewise we would like to see a similar
outline on how the NDA engages with local contractors to offer them a continuation of work.

It would also be helpful to see a table showing the average number of employees and contractors at
each site during the final period of operations and the applicable numbers in the current state of
decommissioning with an indication of the percentage of ‘local’ employees and contractors in each
scenario, living within a 20-mile radius of the site.

In addition to the economic benefits of retaining local operational staff and contractors in
decommissioning work, such individuals will not be commuting great distances to and from the
workplace and so the NDA will be reducing the carbon footprint associated with decommissioning
operations and working a little towards its aspirational target of achieving ‘net zero’.
Page 27 – Cyber Security

The NFLA welcomes the NDA proposal to participate in the cyber exercise ‘Golden Osprey’. Cyber attacks are of real and increasing concern, especially when directed against national critical infrastructure, and the procedures necessary to employ effective countermeasures to prevent a successful remote attack on a nuclear facility, which may compromise safety or, in extremis, cause a disaster, must be fully developed, practised and tested.

In the business plan, there is however a void on the preparations in place to deter physical attacks upon nuclear facilities or the theft of nuclear materials from site.

Only last month, the Non-Proliferation Policy Education Centre published a paper outlining the risks posed by military and terrorist strikes on nuclear facilities in the Middle East. Although the dynamic in the UK is not the same, there are potential lessons to be drawn from it around the vulnerability of nuclear plants to strikes by missiles and drones, technologies now increasingly (and frighteningly) available to terrorist groups as well as nation states.

The paper can be found here:


Accordingly the NFLA hopes that the NDA and its partners has preparations in place to counter any potential physical terrorist attack on a facility, which might be by land, air or sea, or upon nuclear waste in transit, and in addition has rigorous counter-measures in place to prevent the theft of nuclear materials from sites. We would like to see in the Business Plan some record of any activity or exercises, or future plans, to address these threats (subject to restrictions on the disclosure of sensitive information on grounds of security).

The absence of such information is not reassuring.

NFLA member authorities look forward to working with the NDA and its partners on addressing emergency planning issues in the future within the Nuleaf group.

Page 27 - GDF Community Engagement and Page 28 - Public Engagement

The NFLA is disappointed that, despite the Energy Act of 2004 placing an obligation upon the NDA to be ‘an open and transparent organisation with a duty to engage and consult with stakeholders’, the NDA’s actions on reforming stakeholder engagement still fall short of the business’s stated aims to make stakeholder engagement a ‘continual priority for us’ and to encompass harder to reach groups.

In response to the consultation conducted by Celia Wighton of the NDA on the ‘Good Practice Guidelines for Site Stakeholder Groups (SSGs) and Local Liaison Committees (LLC)’ produced by the Young Nuclear Professionals’ Forum and published on behalf of the Nuclear Industry Safety Directors’ Forum (SDF) which concluded only last month, I, on behalf of the NFLA, submitted our detailed comments.

Although the proposed guidelines did not reflect in full the aspirations of the NFLA for greater democracy, inclusivity, and transparency within the civil nuclear SSGs and defence nuclear LLCs, nonetheless we broadly welcomed the publication of the guidelines as a positive, though imperfect, step forward in the much-needed reform of the membership, operation, and accountability of these bodies. We also submitted some additional aspirations to enhance them, and commended both the guidelines and our additional recommendations to the NDA for adoption.

Our comments can be found here:

It was therefore disappointing to hear the NDA Head of Stakeholder Engagement and the Chairs of the SSG Forum had dismissed the proposed guidelines out of hand even prior to the conclusion of the consultation; though their acceptance would have demonstrated the NDA’s clear and tangible commitment to real transparency, accountability and inclusivity in stakeholder engagement and represented a commendation of the Young Nuclear Professionals’ Forum for their worthy initiative.

We would ask the NDA to seriously reconsider making a commitment to encouraging the SSGs and LLCs to introducing these guidelines as part of the final draft of the business plan.

Given the public criticism that has attended the establishment of the GDF Working Groups and Community Partnerships, the NFLA also believes that the ‘Good Practice Guidelines’ and our recommendations should be adopted for these bodies at an early date.

We would also like to see a clear commitment in the Final Business Plan to introducing SSGs in host communities as AGR nuclear plants enter their decommissioning phase.

Page 29 - Sustainability

As an organisation committed to the advancement of renewable energy technologies, the NFLA welcomes the NDA’s commitment to ‘Working towards Net Zero’, but regrets that other than a vague reference to ‘introducing solar power’, this section contains no detail on plans to make it so (though on page 37 the plan has a welcome reference to hydro-electric power generation at Maentwrog).

Specifically we would hope that active consideration can be given to generating onsite power and heat to support decommissioning operations using renewable technologies. Roof-mounted solar systems are now successfully employed upon many public buildings and both these and wind turbines are also widely deployed in the farming sector, many of them also in isolated communities. Given the longevity of decommissioning operations, investment in such technologies should be repaid many fold.

On the following pages reference is made to specific parcels of land so far ‘dedesignated’ from nuclear licensing:

- Page 39 – Berkeley – 11 hectares
- Page 43 – Harwell – 23 hectares
- Page 46 – Oldbury – 32 hectares
- Page 49 – Winfrith – 10 hectares
- Page 59 – Capenhurst – 17 hectares

These figures will only get bigger. Indeed as identified on Page 18 this will ultimately rise to 1,043 hectares.

In the case of Harwell, reference is made to returning land to the Harwell Campus, but otherwise there is no explanation about what this land will be used for.

If the NDA is indeed committed to ‘zero carbon’ and sustainability in its operations, it would be valuable for the final draft of the business plan to indicate clearly if there are plans to generate renewable energy, coupled perhaps with battery storage, from any of these parcels of land, and when.

By way of an illustrative example, the renewable energy community co-operative Low Carbon Gordano is located approximately 20 miles South West of the Oldbury site in and around Portishead.

At Ham Lane, the co-operative operates a 915 KW solar farm located on a 1.6 hectare site. Oldbury, we would speculate, will enjoy pretty much the same solar exposure as Ham Lane and could, theoretically, on its ‘dedesignated’ land currently accommodate 20 such facilities!

If this were to generate more than enough electricity for onsite use, the surplus electricity could be exported as a revenue raiser, sold for profit to the National Grid.

Please also see our earlier comment about the employment of local labour and contractors.
Page 33 - International Relations

Here reference is made to the NDA’s aspiration to be ‘a world leader in facilitating international collaboration in nuclear decommissioning’.

Historically, because of the UK’s regrettable involvement in civil nuclear power generation and the development of nuclear weapons, as a nation we have inflicted significant damage upon Indigenous communities and global environments by supporting uranium mining and by testing atomic and nuclear weapons in South and North-West Australia and amongst the islands of the Pacific.

The NFLA would most definitely endorse the NDA’s aspiration to world leadership in this field if this could combine the provision of advice and assistance to other governments seeking to successfully decommission civil nuclear programmes, some of which will be renumerated anyway, with practical support for world communities impacted by the UK’s past nuclear operations, many of whom remain impoverished and in poor health.

Thank you for your consideration of this letter. My NFLA Councillor colleagues and I will look forward to seeing the final Business Plan in March. In the interim, should you wish to send an acknowledgement or respond to any of the points contained in this letter, please contact the NFLA Secretary, Mr Richard Outram, NFLA Secretary, by email to richard.outram@manchester.gov.uk.

Yours sincerely,

Councillor David Blackburn,
Chair, Nuclear Free Local Authorities

Richard Outram, NFLA Secretary 31.1.22