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Dear Sir/Madam

### **NDA'S PREFERRED AND CREDIBLE OPTIONS FOR DFR EXOTIC FUEL**

The Dounreay Stakeholder Group is an independent body representing over 20 different organisations.

The DSG welcomes the opportunity to review the NDA's credible and preferred option for DFR Breeder fuel. However, due to the wide-ranging views of separate organisations it should be noted that the DSG neither agree or disagree with the preferred option and will leave each individual organisation to respond separately to ensure all views are made available to the NDA when making their final decision.

It should also be noted that Shetland Islands Council, a member organisation of the DSG, has responded separately to this consultation and has not agreed this response.

The DSG would, however, like the following to be noted:

- Safety, security and the environment should be priorities in any decision made.
- Comparing this document to others, which the NDA has published to consult and/or engage with stakeholders, DSG members felt that this was a poor paper. It did not appear to be a carefully constructed paper for stakeholders, was very light on detail and contained misleading and/or confusing information.
- The terminology used led to confusion – the document moved from exotic fuel, to spent fuel, to fuel, to material. The NDA need to be careful with their definition of Breeder Material and then need to be consistent through the document. DSG would find it useful if NDA could explain whether there are any fission products in the breeder material.
- DSG would also question the timing of the decision on the preferred option. Given the site is currently under competition one would have thought that NDA would have waited to see if one the participating bidders proposed a fresh approach to this issue. Added to this a decision on DECC's consultation on the

management of UK's plutonium stocks is still awaited and could potentially change the preferred option.

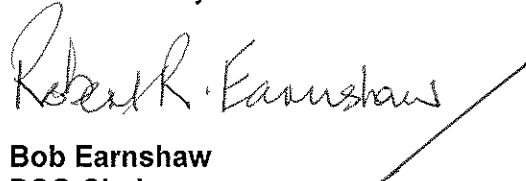
- While road and rail are mentioned as possible transport mechanisms, sea and air were not mentioned despite having been the method used in the past for movement of fuels. [It should be noted that the Orkney Islands Council and Shetland Islands Council, as members of the DSG, wish to dissociate themselves from any suggestion that transport by sea or air should be considered, and indeed explicitly opposes such transport as a matter of policy.]
- While DFR breeder is part of the fuel mix at Dounreay, it is not the complete picture of all the fuels. It would have been more honest of the NDA to explain the nature and extent of all the fuels to be transported. By obscuring the complete overview of all the fuels to be transported, the DSG and general public could easily interpret this as a dubious ploy to get the preferred option for DFR breeder endorsed, as a short-cut way of establishing the principle of transporting all fuel to Sellafield.
- NDA need to be upfront and set out exactly what will happen to this fuel. If the plan is to reprocess at Sellafield then say so.
- DSG would like to understand the categories assigned to fuel. Is breeder fuel a category A material? If this is not the case an explanation of how to transport this category of fuel needs to be addressed fully.
- Of the 40 tonnes mentioned in this paper it would be interesting to know how much of it is plutonium?
- There appears to be some anomalies around the international requirements. DSG members believed that there have been shipments of both irradiated fuel and MOX assemblies in the past and if this is the case then the statement on international requirements on shipments of breeder material is inaccurate.
- It is difficult to understand how the costs of these options are so close without more information. The document does not demonstrate how transport costs, marginal costs for reprocessing plus small product and waste costs equate with an option that requires significant development, modifications to facilities at Dounreay, production of a large number of cemented or grouted drums together with either long term storage or disposal. Stakeholders would expect adequate financial information on which to base judgements of one option against another as in previous consultations undertaken.
- By not providing the complete picture of all potential fuel moves to Sellafield for reprocessing does not allow the affected local community a complete picture of the benefits and/or detriments to transporting fuel off-site. Headlines figures used was that the transport of this fuel could potentially save hundreds of millions of pounds to the UK taxpayer but the response received from questions raised did not appear to address this in any detail to allow an informed decision to be made.
- The DSG welcomes the potential use of legacy equipment, ie cranes at a railhead, if this preferred option is to go ahead. However, DSG feels it has not had sufficient time to consider legacy issues. Given this is potentially a 10 year programme, DSG would like to understand how critical the start date is. With

discussions ongoing in the county looking at the internal transport infrastructure in relation to the energy sector it may have been useful if NDA had published this paper three months earlier to allow communities to fully consider issues such as this.

In summary the DSG is disappointed with the way in which the paper was written and feels that the NDA has taken a backward step in the production of 'engagement' documents. It appears that the decision has already been made and DSG can see no real 'will' from the NDA to consider anything beyond their preferred option.

In addition, the DSG would welcome sight of the NDA's stakeholder engagement plan to engage with those affected by the potential rail transport of nuclear fuel from Caithness to Sellafield. The areas potentially affected include large town/cities such as Inverness and Perth, the Cairngorms National Park as well as a number of nuclear free local authorities and therefore consultation is essential and must be transparent at the earliest opportunity. Given the current timescales that the NDA has set out it appears impossible to adequately consult and the NDA needs to assure all communities that a full consultation will be undertaken,

Yours sincerely

A handwritten signature in black ink that reads "Robert R. Earnshaw". The signature is written in a cursive style and is positioned above a diagonal line that extends to the right.

**Bob Earnshaw**  
**DSG Chairman**

cc Stuart Chalmers, NDA Programme Manager  
Anna MacConnell, NDA Socio Economic and Stakeholder Relations Manager  
DSG members/observers

