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Our Ref: HB/MR/EL2-9
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Date: 21st March 2012

Dear Mr Fountain

Credible Options Study on remaining nuclear materials at Dounreay

The Council wishes to make a series of comments regarding the above proposal.

Firstly the Council wishes to support the views of the Dounreay Stakeholder Group and any submission by the Nuclear Free local Authorities regarding the nature of this study and the DFR breeder fuel paper.

As the DSG commented this appears to be little more than a 'tick box' exercise with the preferred option already identified before seeking any stakeholder comment. Following the NDA's decision to transport the breeder material by rail to Sellafield it is hard, if not impossible, to believe a different decision will be made regarding the so-called exotic fuels and other nuclear materials.

Rather than publishing two separate studies six months apart, it would have been more helpful to have had one study considering all these different fuels and materials as the two studies are comparable with similar arguments for and against each option.

The Council also wishes to protest again at the lack of a full consultation regarding these issues and the lack of complete information and documentation. It is a matter of regret that the NDA decided to "engage with regulators and other stakeholders", rather than conduct a proper consultation. These studies and the subsequent "engagement" seem only to consider "strategic and financial issues" in a "value framework analysis".

As the DSG commented there is an important lack of detail in the current credible options study, particularly regarding the costs of different options, which is particularly strange given

the quotes above. There is also no consideration of environmental issues. Overall it is disappointing that the former practice of Best Practical Environmental Option studies appears to have been abandoned.

The Council would like to support the DSG call for proper financial information regarding the two credible options before any final decisions are made. In addition the Council believes stakeholders need a proper environmental impact assessment of the two Dounreay and Sellafield options.

The Council also agrees with the DSG submission that this engagement exercise, like the breeder fuel exercise, seems driven by trying to reduce the costs of providing security at Dounreay. Without an assessment of the environmental, health, safety, social and financial attributes balanced against the security issues it is impossible to make a properly considered judgement of the NDA's two options.

Important decisions such as the management of the breeder fuel or these exotic fuels and other material should not be driven solely by financial considerations.

In addition it is hard to understand the NDA's logic of moving this material, apparently to reduce security costs, when it is upgrading security at Dounreay at considerable cost and is currently recruiting new security staff for the site.

As the NDA is aware, it is the Council's long-standing policy that legacy wastes and other material should be safety managed at Dounreay and not transported to other sites. Not only does this involve hazardous transports through the length of Scotland but it also transfers any environmental detriment to communities who did not create the wastes and which have received no social or economic benefit from the original activity.

Finally the Council questions why these exotic fuels and other material should not be classified as wastes. The credible options presented by the NDA do not involve any reprocessing or any other re-use, but rather treatment and management as with other wastes.

These exotic fuels and other material are currently being safety and securely managed at Dounreay. Their continued safe and secure management at Dounreay is also included in the current lifetime plan.

Yours sincerely



Harriet Bolt
Environmental Liaison Officer