

Response form

Please use this form to respond to this call for evidence on Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility.

The closing date for the submission of responses is **10 June 2013**.

Responses can be returned by email (preferable) or post.

Email address: radioactivewaste@decc.gsi.gov.uk

Or by post to: The Managing Radioactive Waste Safely team
Department of Energy and Climate Change
Room M07
55 Whitehall
London
SW1A 2EY

Name	June Love
Organisation / Company	Dounreay Stakeholder Group
Organisation Size (no. of employees)	Represents over 25 organisation
Organisation Type	Voluntary group set up as part of Energy Act.
Job Title	Secretariat
Department	
Address	Dounreay.com Traill House 7 Orlig Street Thurso, Caithness, KW14 7BJ
Email	info@dounreaystakeholdergroup.org
Telephone	01847 890886
Fax	01847 893459
Would you like to be kept informed of developments with the MRWS programme?	Yes/ No
Would you like your response to be kept confidential? If yes please give a reason	Yes /No

The Government is interested in your views on the geological disposal facility site selection process outlined in the 2008 Managing Radioactive Waste Safely (MRWS) White Paper. To assist us you may wish to consider the following issues in your response:

- What aspects of the site selection process in the MRWS White Paper do you think could be improved and how?
- What do you think could be done to attract communities into the MRWS site selection process?
- What information do you think would help communities engage with the MRWS site selection process?

The Dounreay Stakeholder Group is represented by over 25 organisations and therefore this response is one that is generally agreed by most organisations. However, there are some organisations, who may not agree entirely with this submission and therefore these organisations have been encouraged to provide their own response.

Process

1. The Managing Radioactive Waste Safely (MRWS) project as set out in the White Paper defines a number of stages that the developers, the UK Government and its agent the Nuclear Decommissioning Authority (NDA), and a participating community would follow in assessing the suitability of the community's area for a Geological Disposal Facility (GDF). Suitability in this context includes a whole spectrum of criteria including technical, financial and socio-economic issues.
2. The MRWS process is designed to assess and develop these issues in a methodical manner with continuous stakeholder involvement. Definitive decisions or conclusions on suitability of the various criteria are not expected or sought in the earlier stages, these being the building blocks for the later more detailed assessment stages.
3. This staged approach has not been fully appreciated by all participants in the failed MRWS initiative in Cumbria. Some participants have actively tried to force decisions or conclusions too early in the process to stall the initiative.

4. Any future MRWS initiative based on the current process as set out in the White Paper must include much stronger emphasis to communities and participants on the measured step by step process. Participants trying to force the pace of decision making or continually “jumping the gun” must be curtailed in an appropriate and transparent manner if there is to be a chance of the process moving forward rationally.

Geology

5. During the MRWS initiative in Cumbria the suitability of the geology became a major issue out of context with the assessment stages of the MRWS process. Objectors to the Expression of Interest in the MRWS process entered into by Cumbria County Council, Copeland Borough Council and Allerdale Borough Council used the possibility of the geology being unsuitable as a continual spoiling tactic to the staged assessment approach. Participants who were committed to the MRWS process did not profess that the geology was suitable but had faith that the MRWS staged assessment process would determine its suitability or not.
6. Discounting the lack of understanding in the staged assessment and decision making process, and the objectors’ use of the supposed unsuitability of the geology to try to derail the MRWS process, it has to be accepted now that the suitability of the geology or its unsuitability is a key factor that has to be faced in a revised manner within the MRWS process. It is going to influence the conduct and direction of the early stages of the MRWS process and participants are unlikely to be willing to let the measured approach take its step by step way towards a final decision.
7. In its recommendation to the UK Government that a volunteerism approach should be employed for a siting process the Committee on Radioactive Waste Management (CoRWM) suggested communities should be invited to express an interest before any UK wide assessment of suitable geology was undertaken. This approach should be reconsidered as the initial screening work published by the British Geological Survey (BGS) could be expanded. This additional work could move the understanding of which areas in England and Wales were unsuitable for a GDF to an understanding of those areas where there would be a strong probability of identifying a suitable volume of rock for a GDF.
8. Such a revised approach could have the following benefits:
 - Nugatory work would be avoided if communities in areas of unsuitable geology expressed an interest
 - Encouragement of communities in areas of suitable geology would be more focussed
 - Communities in areas of unsuitable geology could drop the issue from their agendas

- Subjective claims and counter claims by groups and individuals concerning the suitability of the geology would be open to more objectivity

Proximity to Sellafield

9. Closely related to the requirement for suitable geology is the requirement to be able to transport the radioactive waste from Sellafield, where the majority is stored, to the GDF site. Nuclear transport operations over the last sixty years have demonstrated that there are no technical issues to prevent such transportation operations. The problems are social, political and financial.
10. Over the last few decades the UK has lost its ability to progress major infrastructure projects with a considered balance between risk, economic wellbeing and use of surface land. This manifests itself as self interest versus national requirement, prolonged planning inquiries and investment going outside the UK, to name but a few.
11. A transport operation for moving the large quantities of radioactive waste over many years from Sellafield to a GDF located even a few miles away would require a commitment by UK Government, local government and land owners to actually achieve it. Such a transport system could involve public and dedicated infrastructure and would require permissions from possibly a number of County Councils. Current experience would suggest that both popular and official objection would make the installation of the system either impossible or financially prohibitive.
12. The siting process should therefore acknowledge that the nearer suitable geology can be found to Sellafield the better. Communities in these areas should be given most encouragement and incentives.

Communities

13. The understanding of a “community” is a difficult concept in the context of the MRWS siting process. The process, ending with the completion of GDF construction, could take around 40 years. Taking “residents” as just one aspect of community the likelihood of them being the same homogenous group with the same views over the 40 years is inconceivable. People will be born and die, houses will be sold, built and demolished and political views will change. To say that a community wishes to express an interest or participate in the siting of a GDF really only means that the current residents, local associations and local government wish to do so. The constitution of the community could change, and consequently its views, in a short period of time.
14. In designing a revised siting process it should be considered whether it would be more appropriate to give more emphasis to the actual land and land ownership. After all, planning permissions are attached to land, not the owner or communities.

15. It is also far easier for government officials and the public (supporters, objectors NGOs etc.) to interact with a land owner, a person, government or company than an ill-defined community.

Information

16. It would be difficult to fault the organisation, production and distribution of information involved in the Cumbria MRWS initiative. The failure of that initiative could not reasonably be associated with the provision of information.
17. Likewise the provision and organisation of public events such as seminars, talks and walk in exhibitions was exemplary.
18. This level of effort and money spent on information and stakeholder involvement was applied in an area where there was a higher level of common knowledge of the nuclear industry and radioactive waste than most probably any other area in the UK except Caithness and North Sutherland in Scotland (where Dounreay is situated).
19. The lesson is that a reduction in this level of information to any other community would be counter productive and lead to criticisms of not telling the whole story.

Socio-Economics

20. Construction and operation of a GDF would bring substantial prosperity to an area. The level of inflow of money and provision of jobs is well documented. The understanding that a community needs to acquire is that of the level of risk involved and being able to balance this with the opportunities. The individual does this all the time in everyday life (e.g. driving a car) but as noted earlier as a country we have lost this objectivity.
21. A community has to acquire more confidence that the regulators, Office for Nuclear Regulation (ONR), Environment Agency (EA) etc. are actually doing their job properly and looking after the community's interests. It would help if these regulators took a more pro-active and visible role in the initial interactions with communities. Part of the success the Scandinavians are having with progress of their radioactive waste solutions is that their populations in general trust their regulators.

22. There was a visible lack of leadership from elected officials involved with the Cumbria MRWS initiative. The driving force was the contractor engaged by the Cumbria Partnership and if it had not been for the dynamism and professionalism of this contractor then the process would have faltered well before it did. If a community is to be swayed by the idea of prosperity for insignificant risk then elected officials have to be positively proposing the participation and seen to be leading and committed to the process. This might be easier in conjunction with land owners as mentioned earlier.
23. All of this most probably points to a much greater direct dialogue between UK Government and local government, land owners and communities rather than delegating it to NDA and contractors.

Government owned land

24. A possible way forward for siting a GDF would be to identify land that is owned by the UK Government, that could access suitable geology and that was very near to Sellafield. The technical issues to be resolved would be no different from any other location but the land ownership and community issues, including sustainable continuity would be much simplified.