

**NDA Integrated Waste Management Plan (IWMP) Stakeholder Conference
20th November 2020**

Some Observations by David Broughton, Public Co-opted Member of Dounreay Stakeholder Group (DSG)

26th November 2020

Introduction

1. The Nuclear Decommissioning Authority (NDA) and Radioactive Waste Management Group (RWM), a subsidiary of NDA, organised this virtual conference very well and the internet platform used was first class.
2. The presenters were clearly spoken, knowledgeable and demonstrably enthusiastic for their topics.
3. In my opinion, from the stakeholder point of view, the content and presentation by the Wylfa Site Stakeholder Group (SSG) Chairman, Aled Jones, was the best. It was obvious listening to his style and depth of understanding why he is the UK SSGs' Chairman.
4. Having remarked on the NDA and RWM presenters' enthusiasm and "joy" at the launching of their IWMP one could be forgiven into thinking this was something entirely new. The concepts within the IWMP have been used and operated for decades. The former UKAEA was similar in its UK wide remit to the now re-launched "One NDA". The UKAEA's Decommissioning and Radioactive Waste Management Operations (DRAWMOPS) under Dr. Roy Nelson, who subsequently became Dounreay Site Director, created 100 year, 10 year and 4 year site decommissioning and radioactive waste strategies for all the sites within the UKAEA remit. There was strong liaison with the other nuclear sites such as Sellafield and MOD sites. The disrupting action that compromised these initiatives was the DTI's desire to try contractors running sites, e.g. W.S. Atkins at Dounreay, which led to the ill-fated use of Parent Body Organisations (PBOs) by the new NDA.
5. Whether it was a "One NDA" or not the NDA has been responsible for Radioactive Waste Management for 12 years so I did have the thought during the presentations of what has the NDA being doing during this period!

Near Surface Disposal

6. There seemed to be a renewed interest in Near Surface Disposal for Higher Activity Radioactive Waste (HAW) that will decay sufficiently over a suitable, but very long, time to Low Level Waste (LLW) and therefore be acceptable for such facilities. Such HAW would therefore not need to be disposed of in the projected Deep Geological Disposal Facility (GDF).
7. There was also recognition of how this might or might not fit with the Scottish Government's (SG) HAW Policy. This requires Near Surface *Management* of HAW, not disposal, so is concerned with storage not disposal.
8. SG policy envisages storage of such HAW for 300 years requiring maintenance of facilities and continuous monitoring.
9. An area that will need to be addressed in my opinion will be how will siting decisions be made and how will community acceptance be achieved. Will it be as fraught as the GDF process? However as Dounreay has the need for 3 HAW stores I thought, well, there may be commercial and employment opportunities for further HAW stores to house other Scottish HAW.

Thermal Treatment

10. The discussion on this topic focussed on whether there was enough contaminated steel in the UK to justify building a dedicated Thermal Treatment Plant at Sellafield.
11. Small first batches and trials undertaken abroad have proved successful.
12. It will be important for Dounreay to identify and quantify such contaminated steel to feed into the UK analysis leading to a substantive business case, or not.

13. *(I have two points to make on this issue:*

- *If the UK eventually has a GDF then it might not be cost effective to spend substantial amounts of money on treatments or innovations.*
- *Dounreay is currently ascertaining for me whether the decontaminated steel from Dounreay has been used on the open market. I suggest that substantial re-use of decontaminated thermally treated steel in new manufacturing will require a considerable change in public attitudes to allow it to happen.)*

Office for Nuclear Regulation (ONR)

14. ONR welcomed the IWMP. ONR emphasised its independence and its collaborative approach with other regulators.

Committee on Radioactive Waste Management (CoRWM)

15. CoRWM is still committed to its 2006 report and recommendations to the UK Government which emphasised the necessity of stakeholder trust, confidence in national institutions and support to communities. CoRWM believes this applies equally to the IWMP.
16. CoRWM considers the UK is not as organised with trusting partnerships as some other countries e.g. Sweden, South Korea, Canada.
17. CoRWM asked NDA how NDA was going to change its approach to stakeholder engagement.
18. The response was given by RWM which said that its approach is “Community Consent” and it will emphasise listening very hard to stakeholders.
19. CoRWM then asked how can the UK learn from other countries.
20. The response was given by RWM which admitted that the UK was behind in its stakeholder matters compared to other countries. Specific points RWM made were:
 - The need to reach all sectors of the community
 - Innovative ideas are needed in the UK for communications that help the public to understand the relevant issues
 - Looking at wider community needs for communications
 - The introduction of Liaison Officers working with communities to help them decide what they actually want in the form of communication and involvement
 - The acknowledgement that communities that are neighbours of nuclear industries and their people are workers in that industry; these communities generally have knowledge and heightened awareness of the radioactive waste issues.
 - Increasing such knowledge as above in other areas and communities which have no knowledge or little interest. *(my view:- is this relevant/useful?)*
 - Need to publicise and use the fact that good careers are available in radioactive waste management

Nuclear Legacy Advisory Forum (NuLeAF)

21. NuLeAF said its key objective was the substantive involvement of local government to achieve the best outcomes for local communities.
22. On the subject of the GDF NuLeAF made the following points:
 - It is a highly political project and requires public support which will be multilayered and complex
 - The benefits to a community that hosts the GDF will be enormous
 - Whether to build in “retrievability” or not will be a huge discussion
23. Need better liaison between the NDA and Planning Departments and overall a review of the roles of Local Authorities.
24. “Master Planning” is required giving a more overall long term view for communities and nuclear industry.
 - *(My point:- It ought to be recognised that Dounreay did produce 100 year plans and Scoping Planning Documents for years ahead for the Highland Council Planning Department.)*

Wylfa SSG Chairman (Aled Jones)

25. The key to introducing radioactive waste management facilities to communities is “Social Acceptance”. This amounts to a “Social Licence to Operate”. Such a licence is priceless and cannot be achieved without open and honest communication and commitment between all parties.
26. SSG members are volunteers and need complex issues explained in methodical appropriate ways.
27. Time is very important and the time required for communities to digest facts and information is their prerogative.
28. A SSG is a demonstrable example of local democracy and links the NDA to the community.
29. SSGs should ask difficult questions of NDA.
30. NDA decisions should reflect communities views and requirements.

Nuclear Free Local Authorities (NFLA)

31. NFLA supports the SG HAW Policy and would welcome more discussion on it with the NDA and English authorities.
32. NFLA is sceptical a GDF will ever come to fruition and is opposed to it.
33. Retrievability in any radioactive waste management facility will be a major issue with different views from many people, institutions regulators etc. (my view:- it will be a major stumbling block as the cost differences are enormous and public opinion will vary over the long times involved in discussions.)

Supply Chain

34. The Nuclear Sector Deal aims to reduce costs by 20% for ongoing type activities and 30% for new building, construction or manufacturing type activities.
35. Nuclear operators and the knowledgeable nuclear supply chain recognise the nuclear risks to be low but such risks are assumed to be high for those supply chain organisations that have not been involved with the nuclear sector.
36. Many Small and Medium Enterprises (SME) cannot afford the costs involved in the complicated bidding system for contracts that the nuclear industry uses and these need simplification if a wider range of suppliers is to be enlisted.

Conclusions

37. The IWMP is needed for everyone in the nuclear industry and radioactive waste management fields.
38. The IWMP is a world leading programme.
39. The 15 year programme of the IWMP requires the support and buy-in of local stakeholders through what was termed a “Social Licence to Operate”.
40. The IWMP must demonstrate value for money for the taxpayer.
41. *(my conclusion:- the Dounreay New Low Level Waste Disposal Facilities introduced groundbreaking concepts of stakeholder engagement during the period 2000 to 2010 as suggested should be used by this conference. Dounreay carried out stakeholder events with local communities which included a wide range of groups and a specific one for high school students.)*