Dear Sir/Madam

On 28th May 2012 the Department of Energy and Climate Change initiated a consultation on the proposed application and decision making process for a justification decision under the Justification of Practices Involving Ionising Radiation Regulations (2004) concerning the reuse of the UK's stockpile of separated civil plutonium. Consultees were invited to respond to 4 questions included in the consultation document MANAGEMENT OF THE UK'S PLUTONIUM STOCK, a consultation on the proposed justification process for the reuse of plutonium (http://www.decc.gov.uk/en/content/cms/consultations/pluto_reuse/pluto_reuse.aspx). Please find following the Health Protection Agency's (HPA) response to the four questions.

Question 1: Do respondents agree with the Government's view that it is sensible to issue generic guidance for the reuse of plutonium? We welcome comments on this proposed approach.

HPA Response: HPA agrees with the Government's view that generic guidance on the reuse of plutonium is the most sensible option, rather than limiting the guidance specifically to the reuse of plutonium as MOX.

Question 2: Is the proposed application and decision-making process clear, appropriate and proportionate? If not, how can they be improved?

HPA Response: HPA believes that the decision-making process put forward in the consultation document is clear, appropriate and proportionate. The HPA suggests that Table 1 which sets out individual steps in the decision making process being proposed by DECC for the Management of the UK's plutonium stocks could include a broad timetable or estimates of how long each step is expected to take.

Question 3: Is the indicative list of information in Table 3 sufficient and appropriate to assist in the making of justification applications and justification decisions? Does the indicative list omit any relevant information, or include any unnecessary information?

HPA Response HPA believes that the indicative list of information in Table 3 is appropriate. The HPA suggests that the text in the third bullet point in the Section on Radiological Health Detriments should be redrafted to improve clarity. The bullet point specifies that information should be provided by the applicants on "how design, operation and mitigation strategies will reduce the risk and magnitude of accidental radiological exposures to below regulatory limit". Current UK regulations do not set limits on the risk and magnitude of radiological exposures incurred during an accident at a nuclear installation. The HPA suggests that this bullet point should be redrafted as follows: "how design, operation and mitigation strategies will reduce the risk and magnitude of accidental radiological exposures to levels which are as low as reasonably achievable in accordance with current UK regulations."

Question 4: Are there any other ways in which the draft justification process can be improved? If so, how?

HPA Response: HPA is happy that the justification process proposed by DECC in this consultation meets the requirements of the Justification of Practices Involving Ionising Radiation Regulations (2004) and does not have any suggestions on how it can be improved.

Yours faithfully