

Draft Response by the Nuclear Industry Association to the consultation on the proposed justification process for the reuse of plutonium

The Nuclear Industry Association (NIA) welcomes the opportunity to contribute to this consultation.

The NIA is the trade association and information and representative body for the civil nuclear industry in the UK. It represents over 270 companies operating in all aspects of the nuclear fuel cycle, including the current and prospective operators of the nuclear power stations, the international designers and vendors of nuclear power stations, and those engaged in decommissioning, waste management and nuclear liabilities management. Members also include nuclear equipment suppliers, engineering and construction firms, nuclear research organisations, and legal, financial and consultancy companies.

The NIA was involved in the justification process for the two designs currently undergoing Generic Design Assessment for the UK's nuclear new build programme. With the support of six utilities we submitted an application for the regulatory justification of the AP1000 and EPR reactor designs in November 2008. These designs were subsequently found to be justified in October 2011.

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.

Yes. Whilst Government has identified reuse as MOX as its preferred option for managing the UK's plutonium stocks, the NDA announced in February 2012 that it was seeking proposals on alternative approaches. It therefore makes sense to issue generic guidance.

However to avoid unnecessary pressure on the Justifying Authorities the guidance should include a provision that applications should be limited to scenarios that are under consideration by the NDA.

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

In our view the proposed steps set out in table 1 are clear, appropriate and proportionate.

Our only proviso would be that the regulatory justifications of the AP1000 and EPR reactor designs, which were the subject of the NIA application referred to above, are only applicable to uranium oxide utilisation. It is important that any justification process relating to a plutonium strategy envisaging reuse in these reactors should have no detrimental impact on these existing regulatory justifications.

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?

The indicative information set out in Table 2 is a fairly comprehensive list of all the potential impacts.

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

We have nothing further to suggest.

**Nuclear Industry Association
9 August 2012**