

Dear Sir/Madam,

I am responding as a private individual to the plutonium (Pu) reuse justification consultation. My comments and answers to your questions are as follows:

I don't believe GDA has considered the burning of MOX, this will have to be done separately if not.

20. Quoting radiation dose figures from Springfields is not particularly useful as I don't believe the facility fabricates MOX presently and therefore doesn't have much in common with the subject matter.

MOX is fabricated very successfully, particularly in France (MELOX facility).

Should the consultation not be worded to deal with plutonium, and not just civil plutonium? Although a subtle change, do we want to rule out fabrication of fuel from down blended nuclear weapons? This has been carried out very successfully by Tenex and USEC under the Megatons to Megawatts initiative.  
(<http://www.usec.com/russian-contracts/megatons-megawatts>).

**Question One – 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 I believe that MOX is the best and proven way to dispose of plutonium at present; it shouldn't be treated as the only way. GE's latest work on the PRISM reactor with Manchester may well bear fruit, and is worth a detailed look. By issuing generic guidance, HMG doesn't limit the plutonium disposal options.

**Question Two – Are the proposed application and decision-making processes clear, appropriate and proportionate? If not, how can they be improved?**

Just about! I think any lack of clarity comes about through explaining of EU regulations!

**Question Three – 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?**

Yes. The final comment on disposal of Pu based fuel in GDF is slightly odd. Spent fuel containing MOX is successfully stored in casks in Germany and the US already.

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

A separate justification decision for each application seems a bit unwieldy. Is there no way applications can be grouped?

Kind regards,

Mark Salisbury