

16 August, 2012

Dear Sir or Madam,

Re: DECC Consultation (Reference: URN 12D/075) on the Proposed Justification Process for the Reuse of the UK Civil Plutonium Stockpile

I write on behalf of NuLeAF, which is a Special Interest Group of the Local Government Association. We represent the views of its member local authorities in England and Wales on nuclear legacy management issues and developments that may impact upon that management.

The comments below were finalised after discussion in the NuLeAF Steering Group on 20 July 2012.

Qu1. "Do respondents agree with the Government's view that it is sensible to issue generic guidance for the reuse of plutonium?"

Yes, NuLeAF agrees that it is sensible to issue Guidance to Applicants on the proposed process for Justification.

Qu2. "Are the proposed application and decision-making processes clear, appropriate and proportionate? If not, how can they be improved?"

NuLeAF has no points to raise in connection with the proposed decision making process for Justification.

Qu3. "Is the indicative list of information in Table 3 (Note DECC appears to mean Table 2) 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?"

We consider the matters raised in NuLeAF's response dated 3 May 2011<sup>1</sup> to your consultation at the time on plutonium management should be considered in an assessment of Justification.

NuLeAF considers that Applicants should indicate where proposed practices would, or could, take place and that any future justification process should engage with the relevant communities to assess socioeconomic and environmental impacts. It is further proposed that where possible the 'MOX path' locations for undertaking specific related auxiliary practices and spent fuel, radioactive waste management and decommissioning activities, should also be identified. Different management options give rise to different waste streams and these should be identified and assessed and their impact on the inventory of wastes for long term geological disposal should be explained, so that relevant communities can be engaged, understand, and assess the benefits and detriments of different approaches in the short, medium and long term.

Similarly, it is suggested Applicants be asked to disaggregate and identify the distribution of benefits and detriments locally and nationally. Applicants should set out how they would do this.

Qu4. "Are there any other ways in which the draft justification process can be improved? If so, how?" NuLeAF considers any justification process should recognise that impacts will be felt in specific geographic locations. Where possible generalisations about costs and benefits should be avoided and specific area

assessments should be undertaken. This should include appropriate community benefit measures to offset impacts.

We trust the above comments are helpful to you.

Yours faithfully,

Executive Co-Director

<sup>1</sup> “On the siting of a GDF, as a starting point, potential host communities and their local authorities will wish to understand the implications of reuse and immobilisation options for (i) the design of a GDF and surface facilities,

(ii) the size of the underground footprint, (iii) the period of operation of the GDF, (iv) the developing GDF safety case, (v) the number of required GDFs and (vi) the use of alternative disposal methods.

On the potential siting of a new MOX plant, potential host communities and their local authorities will wish to understand the implications for (i) security arrangements for the manufacture, buffer storage and transport of fresh MOX fuel and (ii) other local impacts and socio-economic benefits.

On the potential use of MOX fuel in proposed new nuclear power stations, as a starting point, potential host communities and their local authorities will wish to understand the implications for (i) safety case development and licensing of a new nuclear power station, (ii) security arrangements for the transport, receipt and storage of fresh MOX fuel and for the interim storage and transport of spent MOX fuel, and (iii) the duration of the interim storage of spent MOX fuel at the nuclear power station site.

We note that consuming the bulk of the plutonium stockpile „in situ \_ – in one or more dedicated MOX burning reactors on available land beside the Sellafield and NuGeneration Ltd sites in West Cumbria – could provide significant safety and security benefits compared to use in other new nuclear power stations that may be built in other parts of the country.

It will be important for Government to give careful consideration to the impacts that potential approaches to plutonium management are likely to have on local confidence in GDF siting and/or construction of new nuclear power stations.”