

The Managing Radioactive Waste Safely Team
Department of Energy and Climate Change
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10 June 2013

Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility

EDF Energy is one of the UK's largest energy companies with activities throughout the energy chain. Our interests include nuclear, coal and gas-fired electricity generation, renewables, and energy supply to end users. We have over five million electricity and gas customer accounts in the UK, including both residential and business users.

EDF Energy's safe and secure operation of its eight existing nuclear power stations at sites across the country makes it the UK's largest generator of low carbon electricity. Spent nuclear fuel from these power stations is currently stored safely and securely at power station sites or at Sellafield in Cumbria. EDF Energy has published plans to build four new nuclear plants, subject to the right investment framework. These new plants could generate enough low carbon electricity for about 40% of Britain's homes.

EDF Energy is supportive of the principles of volunteerism and partnership, as laid out in the Managing Radioactive Waste Safely White Paper in 2008, as the first preference for selecting sites. We believe that the key to success of the process will come from enabling any community involved to engage from the outset in a clear and impartial discussion on the likely benefits and impacts of hosting a national geological disposal facility (GDF).

While it is important that the Government continues to make progress on the implementation of radioactive waste disposal policy, the existing radioactive waste inventory and future arisings from existing nuclear facilities can continue to be safely managed. Providing disposal facilities for higher activity radioactive waste is the long-term objective of the Managing Radioactive Waste Safely programme and the Government has concluded that it is satisfied that effective arrangements exist, or will exist, to dispose of the waste from any new nuclear power stations that are granted planning consent.

In the case of our proposed project at Hinkley Point C, interim storage facilities for intermediate level waste and spent fuel arisings over the lifetime of the power station will be provided, and disposal facilities will therefore not be required for many years.

Our detailed responses are set out in the attachment to this letter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact

I confirm that this letter and its attachment may be published on DECC's website.

Yours sincerely,

Attachment

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EDF Energy's response to your questions

What aspects of the site selection process in the MRWS White Paper do you think could be improved and how?

1. EDF Energy is supportive of the principles of volunteerism and partnership, as laid out in the Managing Radioactive Waste Safely (MRWS) White Paper in 2008, as the first preference for identifying sites. We believe that the key to success of the process is to enable any community involved to engage in a clear and impartial discussion on the likely benefits and impacts of hosting a national geological disposal facility (GDF).
2. It is essential that decision-making processes are clearly set out, and that those potentially affected by proposals for siting a geological disposal facility are given the opportunity to participate fully. The definition of "community", and the role of elected representatives needs to be clear.
3. The process in West Cumbria was halted at a stage long before any decision was needed by the community on whether to accept construction of a GDF. Indeed the process had not even reached the point where the studies to identify what areas might or might not be suitable had been performed. We suggest that in any future process the aim should be so far as possible to ensure that local participation is enabled to proceed to a point where the level of information quite reasonably sought by local people on key issues can be provided before crucial decisions need to be taken on whether or not to proceed further in the process.
4. The West Cumbria MRWS Partnership made considerable efforts to provide information on the process in an unbiased and objective way. It was not the role of the Partnership to act as a proponent for the siting of a GDF in the area, and in practice it was not clear that any one organisation represented the "promoter". We believe it is essential to have someone who can speak authoritatively on behalf of the organisation that is promoting the case. Without this, the community may well receive an unbalanced picture of arguments for and against participation.
5. Our own recent experience of planning major projects has shown that it is important to provide information on proposals at an early stage, and to take account of local views in developing those proposals. We have found it helpful to

establish a local office, open to the public, as a point of access for information, and to have an active programme of engagement with local residents, local authorities (at parish, district and county level) and special interest groups. A key part of this engagement programme is to explain the potential benefits of the project, and also to act as a conduit for feedback from members of the local community.

6. The GDF project is unusual in that the question for the community both before and during the first several years of its engagement is not whether a GDF should be constructed at a particular location but whether or not to participate (or continue to participate) in the process to investigate the possibility of this being acceptable. We suggest that the Government considers identifying someone who is clearly responsible for communicating the arguments for participation (or continued participation) in any future process.
7. From our own experience of major projects, this person would need to work closely with the local community from the outset, ideally by establishing a local office providing ready access, so as to ensure that the issues of most local importance were understood and wherever possible resolved and then communicated to stakeholders.
8. We also believe that the role of independent expert bodies in providing evidence and advice to the local community is crucial, and more could be done to ensure that authoritative expert bodies provide such information. The process in West Cumbria had not reached the stage where a specific proposal was being considered. This meant that the importance of the UK's regulatory framework of consenting, licensing and permitting (that would ultimately all need to be satisfied before any GDF could proceed) was not really visible to local stakeholders. We suggest that in any future process the vital role that these regulatory controls would play in scrutinising the proposals for any GDF was need to be given more prominence from the beginning.

What do you think could be done to attract communities into the MRWS site selection process?

9. Communities will only be attracted into the MRWS site selection process if the balance of benefits and risks is clear. In order to allow informed and balanced decision-making, it is essential that the Government and the Nuclear Decommissioning Authority (NDA) can give a clear picture of the scale – both in terms of geographical extent and in terms of the amount - of investment that would be likely to be realised within the host community. This must of course be related to an assessment of the impacts on the local community in both the short and long term of hosting a GDF.

What information do you think would help communities engage with the MRWS site selection process?

10. The West Cumbria MRWS Partnership undertook extensive work on behalf of a wide range of local stakeholder groups, and produced a detailed report based on independent research and expert reviews. This report, published in August 2012, provides importance evidence that the Government and the NDA should take into account when considering next steps. In particular, the Executive Summary of this report highlighted three of the overarching issues which set the context for the decision on participation. These issues were: the need to reduce the range of uncertainties; the importance of building trust among stakeholders and the public; and to consider further when a Strategic Environmental Assessment should be carried out. We agree that these are key issues for effective engagement.
11. As noted above, access to relevant evidence and impartial expert advice for the local community is essential to inform public debate. There are a number of bodies that can fulfil this role and need to contribute actively to this process, including British Geological Survey, Health Protection Agency, Office for Nuclear Regulation and the Environment Agency.
12. The NDA need to play a leading role in presenting the case for development of a GDF, and in providing accessible information about the technology of GDF construction and operation, including information on the likely impacts (both positive and negative) on the local environment and those that live there. NDA should also draw on experience from elsewhere (both in the UK and overseas) and work to build confidence in their expertise and ability to deliver a practical solution.

EDF Energy
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