



Department  
of Energy &  
Climate Change

## **Call for Evidence**

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

## **Response form**

13 May 2013

## Call for Evidence

Please use this form to answer questions on the Call for Evidence on Managing Radioactive Waste Safely: Review of the Siting Process for a Geological Disposal Facility.

The closing date for the submission of responses is **10 June 2013**.

Responses can be returned by email (preferable) or post.

Email address: [radioactivewaste@decc.gsi.gov.uk](mailto:radioactivewaste@decc.gsi.gov.uk)

Or by post to: The Managing Radioactive Waste Safely team  
Department of Energy and Climate Change  
55 Whitehall  
London  
SW1A 2EY

In order to help us analyse responses, please provide details of your organisation.

When the call for evidence ends, we may publish or make public the evidence submitted. Also, members of the public may ask for a copy of responses under freedom of information legislation.

If you do not want your response - including your name, contact details and any other personal information - to be publicly available, please say so clearly in writing when you send your response to the call for evidence. Please note, if your computer automatically includes a confidentiality disclaimer, that will not count as a confidentiality request.

Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential.

The responses to this Call for Evidence will inform a public consultation that will follow in the autumn.

We would like to keep stakeholders who are interested in the MRWS process up to date on developments. If you would like to be kept up to date please sign up at the end of the form.

# Introduction

1. The UK Government's policy for the long-term management of higher-activity radioactive waste is geological disposal<sup>1</sup>. In 2008 the Managing Radioactive Waste Safely (MRWS) White Paper<sup>2</sup> was published which outlined a framework for implementing geological disposal based on the principles of voluntarism and partnership.
2. Three local authorities formally expressed an interest in the MRWS programme: Copeland and Allerdale Borough Councils, and Cumbria County Council. In January 2013, the three local authorities voted on whether to proceed to stage 4 of the process. The two boroughs voted in favour, but the county voted against. The Government had in 2011 given a specific undertaking that the existing site-selection process would only continue in west Cumbria if there was agreement at both borough and county level. The county's decision therefore ended the existing site selection process in west Cumbria.
3. Shepway District Council in Kent had also taken soundings from local residents, but subsequently decided against making a formal expression of interest in the current MRWS process.
4. The Government remains firmly committed to geological disposal as the right policy for the long-term safe and secure management of higher-activity radioactive waste. The Government also continues to hold the view that the best means of selecting a site for a geological disposal facility (GDF) is an approach based on voluntarism and partnership.
5. Evidence from abroad shows that this approach can work, with similar waste disposal programmes based on these key principles making good progress in countries like Canada, Finland, France and Sweden.
6. The fact that two local authorities in west Cumbria voted in favour of continuing the search for a potential site for a GDF demonstrates that communities recognise the substantial benefits that are associated with hosting such a facility – both in terms of job creation and the wider benefits associated with its development.

## Purpose of the call for evidence

7. In line with the Secretary of State's written Ministerial statement of 31 January 2013<sup>3</sup>, Government has been considering what lessons can be learned from the experiences of

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<sup>1</sup> Radioactive waste disposal is a devolved matter. The Scottish Government has a separate policy and supports long-term interim storage and an on-going programme of research and development. The Welsh Government has reserved its position on geological disposal of radioactive waste while continuing to play an active part in the MRWS process. The Department of the Environment in Northern Ireland supports the MRWS programme.

<sup>2</sup> Managing Radioactive Waste Safely: A Framework for Implementing Geological Disposal  
<https://www.gov.uk/government/publications/managing-radioactive-waste-safely-a-framework-for-implementing-geological-disposal>

<sup>3</sup> See <https://www.gov.uk/government/speeches/written-ministerial-statement-by-edward-davey-on-the-management-of-radioactive-waste>

the MRWS programme in west Cumbria and elsewhere. We are now inviting views on the site selection aspects of the ongoing MRWS programme in this call for evidence, particularly from those who have been engaged in (or have been interested observers of) the MRWS process to date. The responses to this call for evidence will inform a consultation that will follow later in the year.

## Background

8. Higher-activity radioactive wastes are produced as a result of the generation of electricity in nuclear power stations, from the associated production and processing of the nuclear fuel, from the use of radioactive materials in industry, medicine and research, and from military nuclear programmes.
9. As one of the pioneers of nuclear technology, the UK has accumulated a substantial legacy of higher activity radioactive materials. Some of it has already been processed and placed in safe and secure interim storage on nuclear sites. However, most will only become waste over the next century or so as existing facilities reach the end of their lifetime and are decommissioned and cleaned up safely and securely.
10. These higher-activity wastes can remain radioactive, and thus potentially harmful, for hundreds of thousands of years. Modern, safe and secure interim storage can contain all this material – but this method of storage requires on-going human intervention to monitor the material and to ensure that it does not pose any risk to human or environmental health. While the Government believes that safe and secure interim storage is an effective method of managing waste in the short to medium term, the Government is committed to delivering a permanent disposal solution.
11. In October 2006, following recommendations made by the independent Committee on Radioactive Waste Management, the Government announced its policy of geological disposal, preceded by safe and secure interim storage. The Government subsequently announced that it would pursue a policy of geological disposal with site selection on voluntarism and partnership. This remains Government policy.

## Geological disposal

12. Geological disposal involves isolating radioactive waste in an engineered facility deep inside a suitable rock formation to ensure that no harmful quantities of radioactivity ever reach the surface environment. It is a multi-barrier approach, based on placing packaged wastes in engineered tunnels at a depth of between 200 and 1000m underground, protected from disruption by man-made or natural events.
13. Geological disposal is internationally recognised as the preferred approach for the long-term management of higher-activity radioactive waste. It provides a long-term, safe solution to radioactive waste management that does not depend on on-going human intervention.

## Response form

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Or by post to: The Managing Radioactive Waste Safely team  
Department of Energy and Climate Change  
Room M07  
55 Whitehall  
London  
SW1A 2EY

Name	
Organisation / Company	Lake District National Park Authority
Organisation Size (no. of employees)	
Organisation Type	
Job Title	
Department	
Address	
Email	
Telephone	
Fax	

Would you like to be kept informed of developments with the MRWS programme?

yes

Would you like your response to be kept confidential? If yes please give a reason

no

The Government is interested in your views on the geological disposal facility site selection process outlined in the 2008 Managing Radioactive Waste Safely (MRWS) White Paper. To assist us you may wish to consider the following issues in your response:

- What aspects of the site selection process in the MRWS White Paper do you think could be improved and how?
- What do you think could be done to attract communities into the MRWS site selection process?
- What information do you think would help communities engage with the MRWS site selection process?

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

Based on our experience of the previous MRWS process, we believe that there is a need for the White Paper to provide greater clarity and precisions over the purpose of each stage of site selection, and the process that would be followed. A great deal of concern amongst communities and stakeholders related to the inherent uncertainty of what they were being asked to commit to at each stage; the full implications of decisions that were required to be taken were not fully understood (for example there was a belief in some communities that a decision to participate was a decision to begin construction).

Based on international experience consideration should be given to determine whether a more detailed geological assessment is undertaken prior to engaging any potential 'host communities' to determine if there is a reasonable prospect of a suitable area being found. This would give affected communities confidence that the underlying geology was suitable for a GDF and engineering solutions were not simply being designed to support the available host rock. As part of the geological assessment details of the scale and nature of the exploratory process needs to be clearly identified and articulated to avoid misinterpretation of shorter term impacts resulting from investigations.

Clarification and reasoning should be provided about when (i.e. at which stage) a Strategic Environmental Assessment would be undertaken in order to comply with European legislation.

The Right of Withdrawal should be established in legislation to build trust into the process and give communities (at every level) confidence that they are not bound by decisions they take when investigating the prospect of hosting a geological disposal facility.

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

The safety of a GDF is the primary concern regarding the site selection process, and communities need to have trust in the regulators, designers and operators that safety is their

primary concern.

Whilst safety needs to be recognised as the critical factor in attracting communities into the MRWS process, it is appropriate for Government to outline - based on evidence and assessment of need - what community benefits would arise from hosting a facility. Government should give serious consideration to not only developing the benefits packages, but also start to bring these forwards for implementation as part of the process once geological suitability and safety are assured, as this will build trust and confidence that commitments to benefits will be honoured.

In West Cumbria critical strategic infrastructure improvements are required. Improvements to rail infrastructure on the Cumbrian Coastal Railway Line would benefit residents, business, and visitors alike. Such improvements will give communities confidence in the authenticity of the commitment to support them should they host the facility and it would assist in maintaining positive engagement and buy-in.

Clarification about who makes up or represents a 'community' would be beneficial to the process, as ambiguity proliferates further mistrust in the process.

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

Throughout the MRWS process we received a clear message from local communities that retrievability was critical to their acceptability of such a facility. This was based on a view that it was imperative that remedial action could be taken should the waste within the facility begin to escape or become insecure.

In order for a new MRWS process to successfully take place Government should clarify whether waste would be retrievable and/or able to be monitored, together with a full risk assessment of the potential options. With increased certainty and understanding, communities would be better informed and able to engage with the process more meaningfully.

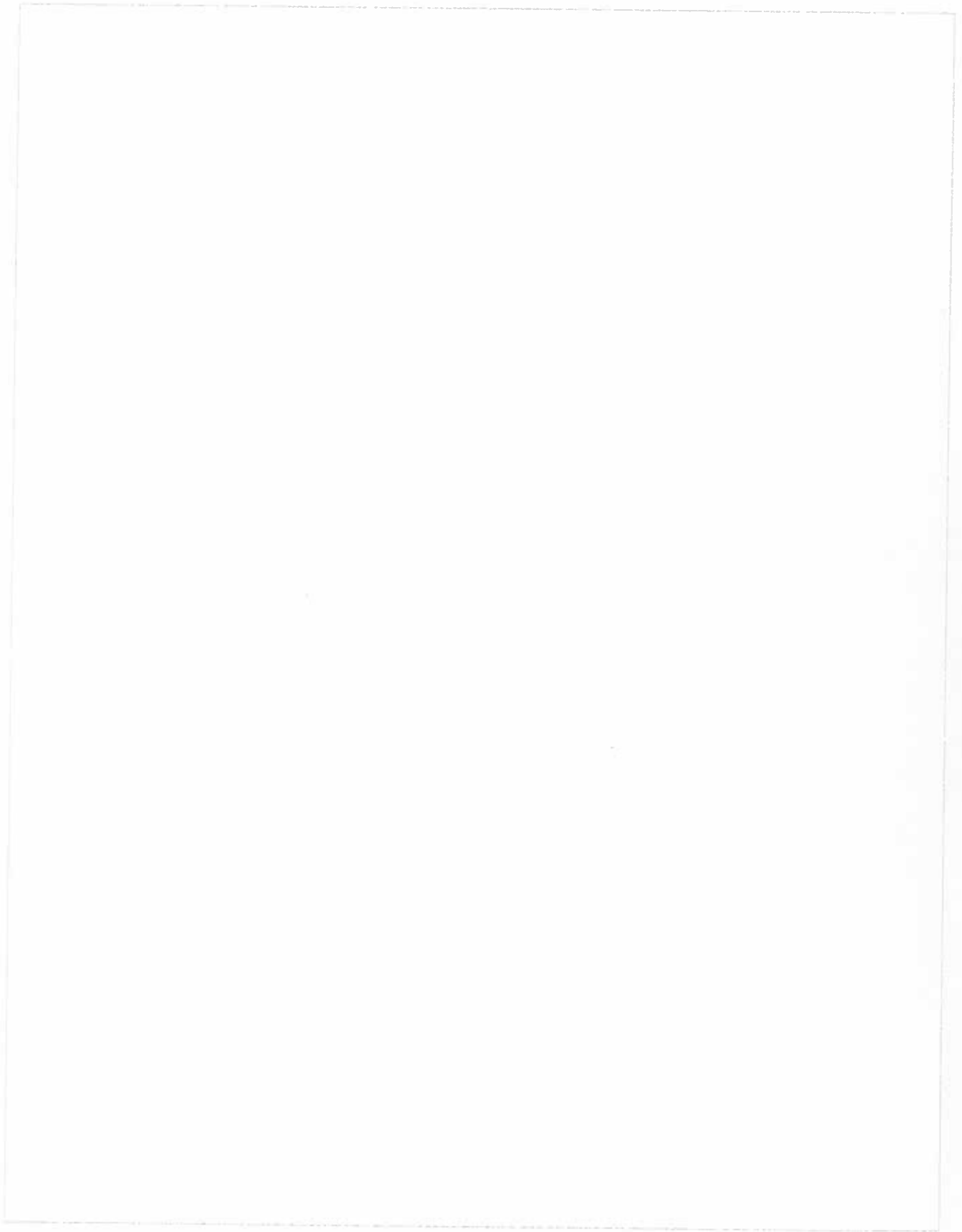
Communities were also heavily focused on the potential impacts upon the Lake District National Park. This concern can be categorised into two main themes. First, there is particular concern over the impact upon the Cumbrian economy, which is so heavily reliant upon tourism – particularly in and close to the Lake District. Businesses capitalise upon the Lake District 'brand' and public perception of the area is critical to success. Brand protection is very much seen to be a necessity as part of the process and beyond, should a facility be accommodated in Cumbria. We believe it would be essential that an economic assessment is undertaken to determine what impacts a GDF could have on the wider economy, as this would provide an understanding of potential benefits and harm which could result from a GDF.

Second, giving protection to the National Park for its own sake - in line with statutory National Park purposes and in recognition of its defined Special Qualities – was a strongly voiced opinion. This made it clear that more thought needs to be given to the parameters of what may be appropriate locations for both surface and sub-surface development to accommodate a

disposal facility.

Based on the experience of the West Cumbria MRWS process it is clear that the question of identifying areas of National Parks for consideration is very contentious and is likely to be contrary to National Park purposes as outlined in legislation. It may be beneficial to future processes to exclude areas which are the subject of National Park designation.





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URN 13D/105