

HORIZON

NUCLEAR POWER

Response to the DECC consultation on site selection for a Geological Disposal Facility (GDF)

5th December 2013

Introduction

- i. Horizon appreciates the opportunity to respond to this consultation
- ii. Horizon Nuclear Power was formed in January 2009 as a 50:50 joint venture between E.ON and RWE, and was acquired by Hitachi Ltd as 100% shareholder in November 2012.
- iii. Horizon is bringing forward plans to develop a minimum of 5,200MW of new nuclear power generation at Wylfa on the Isle of Anglesey and at Oldbury-on-Severn in South Gloucestershire.
- iv. Horizon is working towards a Final Investment Decision for its first unit at Wylfa from 2018 once relevant permissions, consents and conditions are in place; and expects to see first commercial generation in the first half of the 2020's.
- v. Horizon welcomes the policy stability of Government's continuing commitment both to Geological disposal and to community volunteerism.

Overview comments

- vi. Delivering a solution for waste management is a key obligation on UK government, following military, civil and medical applications of nuclear research and development dating back to the 1940's.
- vii. It is also central to the framework necessary for new build; and as a responsible developer Horizon is committed to the safe and secure long-term management of the waste that will be produced from our proposed stations.
- viii. Horizon's proposed technology – the Advanced Boiling Water Reactor (ABWR) – will produce a very small quantity of waste in comparison with the existing legacy inventory. In line with our obligations, Horizon recognises that we will pay our full share of costs for our waste to be hosted in a centralised UK facility.
- ix. Despite the Cumbria County Council vote in January 2013, it is clear that there was significant interest from some communities in hosting a repository facility. Horizon welcomes proposed revisions which will allow the "most competent local authority" to become a volunteer community.
- x. Horizon believes that greater up-front provision of information, coupled with revisions to the framework for the right of withdrawal will be of benefit to prospective host communities.
- xi. Horizon believes that the revised approach to site selection represents a meaningful and significant step forward in the process for long-term management of UK radioactive waste.

Specific Responses

- 1. Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place? If you do not agree with the need for such a test, please explain why.***

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- a. Horizon recognises that community buy-in is central to the principal of volunteerism, however it is important that any process designed to test public opinion is focussed on the specific local community that will be most affected. It is important that decisions regarding the processes for testing buy-in are made against the backdrop of informed debate amongst those being asked for support. Horizon believes that the most appropriate mechanism for testing public support is via winning the support of local elected community representatives.
- 2. *Do you agree with the proposed amendments to decision making within the MRWS siting process? If not, how would you modify the proposed phased approach, or, alternatively, what different approach would you propose? Please explain your reasoning.***
- b. The proposed amendments seem appropriate in light of lessons learned from the previous process. Following the apparent lack of sufficient information and resulting speculation around the geological suitability of volunteer communities in the previous process, Horizon particularly welcomes greater up-front provision of technical information.
- 3. *Do you agree with this approach to revising roles in the siting process set out in the White Paper? If not, what alternative approach would you propose and why?***
- c. The remit of RWMD and UK government to run a programme of community engagement is important in ensuring an informed debate within the host community.
- d. Peer reviewing of publications is also an important step towards building confidence in information made available to the public.
- e. A failing recognised in the previous process was the absence of an advocacy body for development. Whilst HMG or RWMD may advocate the development of a GDF as a whole; it is important that there is a body with the remit to advocate the development of a GDF within each volunteer community specifically.
- f. This role is played by the 'developer' for other nationally Significant Infrastructure Projects (NSIPs). However with potential multiple volunteer communities, RWMD (the developer in this case) could be restricted from doing so. It is essential there is a body with the remit to advocate development within specific proposed communities.
- g. Horizon agrees that under the previous process, "as decision making bodies councillors felt that they were forced into adopting a neutral position". Given that GDF is already Government policy, Horizon would advocate treating GDF as a Nationally Significant Infrastructure Project - whilst this will reduce the decision making responsibilities of the council, they will remain a statutory consultee.
- h. Horizon believes there are similarities to the Anglesey Energy Island programme through which a development body or workstream has been separated from the statutory and consultative responsibilities of the Council. A similar model could be an appropriate mechanism for advocacy of GDF development within a volunteer community.

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4. Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process? If not, what alternative approach would you propose and why?

- i. Horizon supports the proposed approach; welcoming greater up-front provision of geological information whilst recognising that unsuitability screening is not specific enough.

5. Do you agree with this proposed approach to planning for a GDF? If not, what alternative approach would you propose and why?

- j. Horizon recognises the consistency of approach in including the GDF within the planning framework for other major infrastructure projects. Horizon also agrees that exploratory works should be considered within the same planning framework as the later process.
- k. Development of a non site-specific NPS will be important to avoid biasing the volunteerism approach.

6. Do you agree with this clarification of the inventory for geological disposal – and how this will be communicated with the volunteer host community? If not, what alternative approach would you propose and why?

- l. Horizon recognises the potential benefits of baseline inventory clarification for volunteer communities. However capping of proposed new build waste within the inventory at a “specified maximum size” could restrict future new build proposals. Any such move could restrict the clarity and certainty of waste management routes for new build developments above this threshold. This would significantly damage future development, which will be untenable without an end-to-end solution in place.
- m. Horizon also notes that our proposed reactor type – the Advanced Boiling Water Reactor (ABWR) – is currently undergoing Generic Design Assessment (GDA) which will include a disposability assessment on waste and spent fuel.

7. Do you endorse the proposed approach on community benefits associated with a GDF? If not, what alternative approach would you propose and why?

- n. Horizon agrees with the principle of fair community benefits reflecting the service a host community is providing to the broader UK. However it is not for Horizon to comment specifically on the scope or approach of a GDF community benefit programme.

8. Do you agree with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF? If not, what alternative approach would you propose and why?

- o. Horizon has no concerns on the proposed amendments, and suggests that environmental and socio-economic assessment should be made in-line with those for other NSIPs of this scale and nature.

9. Do you have any other comments?

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p. No further comments.

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