

Re: Consultation on Methodology to Determine a Fixed Unit Price for Waste Disposal and Updated Cost Estimates for Nuclear Decommissioning, Waste Management and Waste Disposal.

Apologies but I have been unable to use your official form. Please accept this email as my consultation response.

Submitted as an individual by: Cllr Philip Booth

Chapter 3: The methodology to determine a Fixed Unit Price

1 Do you agree or disagree that prospective operators of new nuclear power stations should be given the option to defer the setting of their Fixed Unit Price? If so, do you agree that this deferral should be limited to 10 years after the nuclear power station has commenced operation? Do you have any comments on the way the Government proposes to determine an expected Fixed Unit Price as the basis for an operator's interim provision in the event that they choose to defer the setting of their Fixed Unit Price?

Answer:

The industry must be made to legally pay the full costs of waste disposal up to the time of disposal. The proposals for either an eFUP or FUP are mistaken. FUP is caps liabilities leaving the taxpayer at risk. The eFUP is also a nonsense as we cannot accurately estimate costs - previous attempts have shown how flawed this process is. It seems obvious that the way forward should be for nuclear operators to put waste funding before any dividends to investors otherwise we will have another British Energy situation. In other words sufficient money must be put away to deal with the wastes and spent fuel as and when they are created.

Question 2

Do you agree or disagree with the proposal that the Schedule for the Government to take title to and liability for an operator's waste should be set in relation to the predicted end of the decommissioning of the nuclear power station? Do you have any comments on the way the Government proposes to recoup the additional costs it will incur in this case?

Answer:

This proposal must be rejected strongly. It seems strange that this suggestion is even being put forward. Operators must remain financially and legally liable for their waste until it can be disposed of. Otherwise I can foresee a scenario where taxpayers end up being liable for hidden costs like extended storage. There is also no process for Parliamentary or public scrutiny to review any of potential cost increases. This is not open and transparent government. If FUP funding goes ahead then operators must be liable for anything outside that. Furthermore there are dangers of mixing old and new waste: costs of new waste can be transferred to management of the old waste.

Question 3

Do you agree or disagree that the proposed methodology to determine a Fixed Unit Price strikes the right balance in protecting the taxpayer, by taking a prudent and

conservative approach to cost estimation, while facilitating new nuclear build by providing certainty to operators? What are your reasons?

Answer:

It maybe me but there does not seem to be sufficient info to work out if the proposed methodology re FUP is right. There are so many uncertainties that do not seem to have been considered. As has been said by other commentators like Greenpeace this whole consultation seems to be about justifying new build over the interests of taxpayers. If operators can't accept the risks then we should be looking at lower risk, lower carbon alternatives.

Question 4 Do you agree or disagree with the proposed approach to determining an operator's contribution to the fixed costs of constructing a Geological Disposal Facility? What are your reasons?

Answer:

It is at least clear that there are many unanswered questions re the Geological Disposal Facility. How can we be sure geology is stable for so many thousands of years? How can we be sure a community is happy to take new build waste? Are we sure that new build waste will be accepted into the 'first' GDF? This has not yet been decided yet new build waste could add over 50% to the volume and some three-fold increase in radioactivity. The full cost of disposal of new build waste must be paid including factors like the construction of the facility and the estimated £1bn costs so far of the design of the GDF. These issues need resolving.

Question 5 Do you agree or disagree with the proposal that the units to be used for the Fixed Unit Price are pence per kWh for spent fuel and cubic metres of packaged volume for intermediate level waste? What are your reasons?

Answer:

It is unclear in the consultation papers to me what happens if electricity prices go down and how operators will make up any shortfall in waste funds.

Question 6 Do the updated cost estimates represent a credible range of estimates of the likely costs for decommissioning, waste management and waste disposal for a new nuclear power station?

Answer:

No. As noted there are too many unanswered questions and too many unknowns. One example is the huge impact that possible reprocessing of spent fuel from new build could have on any plans. This would have significant financial and environmental impacts.