Respondent Details	
Name:	Charles Holmes
Organisation:	Allerdale Borough Council

Please select the category below which best describes who you are responding on behalf of.

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The consultation document sets out the Government's proposed approach to the longer term management of the UK's plutonium stocks for public scrutiny and consultation. Comments on any aspect of this issue are welcome, but the key questions posed in this consultation are:

No	Question
Q1	Do you agree that it is not realistic for the Government to wait until fast breeder reactor technology is commercially available before taking a decision on how to manage plutonium stocks?
Response	Yes, there are a number of significant drivers for change. As highlighted in the Government's consultation document, these are: • the need for the ongoing refurbishment or replacement of specialist and costly storage facilities (paras 1.5 and 3.37); • uncertainties about the ageing processes that may affect plutonium in long-term storage (para 3.38); • the finite life of packaging and the likely need for periodic re-packaging (para 3.38); and • the radioactive decay of plutonium to americium, which is more challenging from a dose and heat perspective, thereby making the plutonium increasingly more complex and costly to handle over time (para 3.44). These drivers provide significant reasons to implement options other than the continued storage of separated plutonium.
Q2	Do you agree that the Government has got to the point where a strategic sift of the options can be taken?
Response	Yes, in principle, although we have comments on the actual strategic sift that is proposed. We agree that disposal options need to be worked up, in order to deal with the small percentage of the plutonium that is not re-usable and as a contingency in case the stated conditions for reuse cannot be met. We also agree that some of the specific approaches to immobilisation

	should be ruled out at this stage (namely immobilisation in cement) as they would produce such a large volume of packaged waste as to place unrealistic demands on manufacturing and interim storage and have a significant impact on the Geological Disposal Facility. Finally, we would request that the Government clarify whether further consideration will be given to the potential use of Inert Matrix Fuel (IMF) in the on-going further work on the reuse option. We note the conclusions of the BNFL National Dialogue that IMF may offer significant advantages over MOX in terms of intrinsic proliferation resistance and enhanced disposability. We also note the NDA's position in January 2009 that "On reflection we agree that it may be premature to rule out this option. We believe it is unlikely that the technology will come to maturity in a timescale commensurate with the definition of credible, however, if it is something that fuel vendors are interested in bringing to the market it is an option that NDA would consider."
Q3	Are the conditions that a preferred option must in due course meet, the right ones?
Response	We note the proposed conditions, that the preferred option: • must be achievable and deliverable • must be shown to be capable of meeting health, safety and environmental requirements as well as meeting non-proliferation and security objectives • must demonstrate that it provides value for money and is of overall benefit to the UK. We propose that a further condition be adopted by Government. This is that the preferred option be "capable of inspiring public confidence". The Government will note that this was the formulation set in CoRWM's original terms of reference for consideration of long-term management options for higher activity wastes. As the long-term management of plutonium also raises substantive societal issues, we consider that such a condition would be highly appropriate and we believe that in introducing this important condition, Government should consider how judgements might be reached about whether a "capable of inspiring public confidence" condition has

	been met. Subject to this additional proposed condition, we consider that, at a very high level, the proposed conditions appear to be the right ones. However, we would welcome further clarification of: (a) what factors the Government intends to take into account to make judgements that conditions can be met (particularly on achievability and deliverability, and value for money and overall benefit to the UK); and (b) how judgements will be reached (including what assessments will be undertaken).
Q4	Is the Government doing the right thing by taking a preliminary policy view and setting out a strategic direction in this area now?
Response	We think it appropriate that the Government takes a preliminary policy view and sets a strategic direction. Nonetheless, we would also like to see continued support to on-going work on alternatives, so that realistic contingencies can be developed should a preferred option ultimately not meet the conditions outlined above.
Q5	Is there any other evidence government should consider in coming to a preliminary view?
Response	There is a need for Government to carefully consider how and when to seek the views of potential host communities and their local authorities with regard to: • the siting process for a Geological Disposal Facility (GDF); • the potential use of MOX fuel in proposed new nuclear power stations and; • a appropriate level of community benefits. 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 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. 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. Proposals need to include the consideration of an appropriate level of community benefits in the context of resolving an issue of national significance.
Q6	Has the Government selected the right preliminary view?
Response	Yes. However, we wish to propose that Government give consideration to the pros and cons of the immobilisation of that proportion of the plutonium stockpile that is unlikely to be reusable as a reactor fuel. We suggest that this consideration focus on the potential for producing a 'low specification MOX' waste form using the existing Sellafield MOX plant (SMP). We would encourage the Government to publish the results of this further consideration. We note the Government's views that: • the technology to make 'low specification MOX' pellets is well developed (para 3.25); • it may be possible to adapt the existing SMP to produce some 'low specification MOX', but there would not be enough remaining design life for it to be used to convert the entire UK stockpile (para 3.32).
Q7	Are there any other high level options that the Government should consider for long-term management of plutonium?
Response	See the comments above about IMF (response to Q2) and a 'low specification MOX' waste form (response to Q6).

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