Isle of Man Government
Reiltys Ellan Vannin

Department of Environment, Food and Agriculture

Rheynn Chymmyltaght, Bee as Eirinys

Ken Kinrade,
Chief Executive,

Plutonium Consultation
3rd Floor, Area C/D
Nuclear Policy Unit
Department of Energy and Climate Change,
3 Whitehall Place,
London
SW1A 2AW

9th May 2011

Dear Sir/Madam

A submission by Isle of Man Government's Department of Environment, Food and Agriculture (DEFA) in response to the request for comments on the Consultation document entitled 'Management of the UK's Plutonium Stocks'.

The Department of Energy and Climate Change (DECC) indicated that it would welcome comment on any aspect of the issue of long term management of the UK's separated civil plutonium, therefore I am pleased to make this submission on behalf of the Isle of Man Government.

My comments are in response to Consultation question 5: *'Is there any other evidence government should consider in coming to a preliminary view?'*

Having read the DECC Consultation document and also the Nuclear Decommissioning Authority's recently re-issued 'credible options paper' (Ref.1) I should say firstly, that the range of potential outcomes to the issue of plutonium management do not appear to offer the Isle of Man Government any obvious preference in relation to safeguarding our environmental interests. All three high level options: i) indefinite storage, ii) immobilisation as waste, or iii) reuse as MOX fuel – have associated dangers and environmental detriments which raise serious concerns when viewed from our perspective.

Of course I readily acknowledge that the prerequisite for any UK Government actions on the plutonium issue must be the safety and security of the plutonium stockpile. I would also assume the UK's expert advisers must be best placed to judge the optimal course of action in this regard (as they will have the best technical understanding of the issues involved). Likewise as the 'default strategy' seems to be long term storage, it seems prudent to fund research into plutonium immobilisation technology.

Therefore with the caveat that it is certainly not the Isle of Man Government's intention to debate the technical merits of the options to manage the plutonium stockpile; I would wish to offer some comments on certain matters viewed from our position in close proximity to Sellafield.

I wish to make clear the fact that Isle of Man Government has the expectation that our local environment and the safety of our population will not be placed at any risk of detriment from the plutonium stockpile.

I note that the DECC Consultation document states that *'the UK Government is proposing to take the preliminary policy view that the best prospect of delivering a long-term solution for plutonium management is through a reuse as MOX fuel option...'* . One major implication of such a decision appears to be the necessity for either a new or a refurbished MOX fuel fabrication facility at the Sellafield nuclear site. An assumption has also been made that a new MOX plant would operate for 30 years in order to convert the UK's plutonium to MOX fuel. Isle of Man Government's concern would be focused on the operational safety of such a MOX fuel manufacturing plant, which we believe would be processing very hazardous nuclear materials. The existing MOX plant has processes involving the mixing, milling, pressing and sintering of uranium and plutonium oxides. The risk of a serious accident at a MOX fuel plant giving rise to the release of such radioactive materials to the environment would be of particular concern.

A further concern to Isle of Man Government is the likelihood of 'consolidated storage' for security reasons which would seem to allow for the possible movement of all of the UK's civil plutonium to Sellafield. The Isle of Man Government remains firmly opposed to the transfer of further quantities of nuclear materials to Sellafield, our preference being to see a reduction in the quantities being stored at Sellafield.

The Isle of Man Government also has a longstanding objection to Sellafield's nuclear cargoes being transported through the Irish Sea, except in circumstances when the material is being repatriated to its country of origin. Of more recent concern are new developments in Sellafield's MOX fuel business with foreign customers, which has involved the shipment through the Irish Sea of the more hazardous MOX component materials (in addition to the completed MOX fuel rod assemblies themselves).

In conclusion, I hope my comments have explained the Isle of Man Government's views on certain matters mentioned in the Consultation document 'Management of the UK's Plutonium Stocks'. Whilst I recognise the difficulty in achieving the optimum solution, Isle of Man Government strongly opposes any UK Government decisions which increase the risk to our population from processing or storing plutonium at Sellafield.

Yours sincerely,

Signed by C. Quaye
on behalf of
Ken Kinrade,
Chief Executive

Ref.1. Plutonium Credible Options Analysis (Gate A) version 2.0, Nuclear Decommissioning Authority, 2010