Respondent Details	
Name:	Andrew Jeapes

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

☐	Business representative organisation/trade body
☐	Central Government
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X	Individual
☐	Large business (over 250 staff)
☐	Legal representative
☐	Local Government
☐	Medium business (50 to 250 staff)
☐	Micro business (up to 9 staff)
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☐	Trade union or staff association
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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	I suggest that it is imprudent rather than unrealistic to wait until fast reactor is deployed. However, I do not think it is satisfactory to treat fast reactor technology as some mysterious unknown and to ignore it in order to develop a policy for management of the plutonium stocks. The nature of and issues associated with a fast reactor fuel cycle are well known and work needs to be undertaken to establish the 'worth' of the plutonium stocks. This is important so that any decision to use the existing stock as thermal MOX or to treat it as waste can be fully understood. In other areas of the nuclear industry there has been concern that future options should not be foreclosed prematurely and it is logical to apply a similar approach here. I think that the timescale for deployment of fast reactor technology is primarily governed by economic considerations rather than technical ones. Consequently it is not impossible that fast reactors will become viable within, or shortly after the suggested timescales for conversion of the Pu stocks to thermal MOX or to waste. Hence what will be the risks (economic and technical) of potentially premature disposition of the Pu stock? If the Pu stock has been put beyond use does this mean that a fast reactor cycle will automatically be ruled out. If this is not the case then presumably it will be necessary to reprocess whatever stocks of irradiated oxide fuel are in storage. To go down such a road will certainly be expensive, and would probably delay the introduction of a fast reactor cycle. More significantly it would be a major challenge not to recreate some of the risks of proliferation/diversion for which the original Pu stock was put beyond use.
Q2	Do you agree that the Government has got to the point where a strategic sift of the options can be taken?
Response	No – Judging by the briefing material I don't think that the risks of continued storage of the Pu stocks have been sufficiently well defined and the consequences of denying the use of the Pu for a future fast

	reactor cycle appear to be ignored. The nature of the risk of storage of the Pu stocks needs to be put in the context of other UK stocks of fissile materials and stocks of radioactive waste. It seems to me that the overriding concern specific to the stocks of Pu is the potential diversion of the material for nuclear weapons. This is a highly specific threat and any inadequacies in the current system of storage need to be addressed now rather than by means of a policy that will take decades to implement. I would like to see how the gradual reduction in the Pu stock is the best way of addressing the concern about diversion of material to nuclear weapons. I expect that the risk barely decreases as the stock reduces and thus will persist for decades. In addition the operations to convert the Pu stock to thermal MOX or to a stabilised wasteform will bring new risks for diversion of material as many transfers of Pu will need to be made and buffer stockpiles will be generated as part of the processing operations. While the Pu stockpile is being reduced what are the plans for other fissile material? These may be smaller in quantity but should be of equal concern. I can understand that there may also be concerns about material which could be used to make a so-called 'dirty bomb', ie. to disperse radioactive material in a way to generate fear and alarm among the general public. However there are many sources of radioactive material that would serve this purpose (including irradiated or unirradiated Mox fuel) and hence a protracted programme of processing the Pu into other forms would scarcely be any safer in this regard is a non-starter.
Q3	Are the conditions that a preferred option must in due course meet, the right ones?
Response	Yes, provided full consideration is given to the risks that the conversion processes do not create more opportunities for diversion than continued storage.
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	It is right to determine what is technically and economically feasible but I am concerned that the scope will not consider future scenarios in which it is desirable to retain the Pu stocks. Consequently, there is a need to understand at what point the steps taken are irrevocable?

Q5	Is there any other evidence government should consider in coming to a preliminary view?
Response	The government should take a view on the proliferation risks associated with other fissile material stocks in the UK. Including those currently considered to be wastes. Once this policy of converting the Pu stock to thermal MOX or to a stabilised wasteform is implemented has the UK government made the prospects for start-up of a fast reactor cycle even less economic?
Q6	Has the Government selected the right preliminary view?
Response	Taking a preliminary view seems to be a logical step, if only because it should ensure that the right questions are being asked - technical/economic/safety/political
Q7	Are there any other high level options that the Government should consider for long-term management of plutonium?
Response	I cannot think of any.