

Respondent Details	
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Organisation:	Nuclear Liabilities Fund Limited

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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	We support the view that commercial use of fast breeder reactor technology is a long way in the future and it is timely for the Government to develop a policy for the UK plutonium stocks.
Q2	Do you agree that the Government has got to the point where a strategic sift of the options can be taken?
Response	The high level options are at different stages of development but the strategic sift will allow resources to be used most effectively. There must be a process for keeping the strategy under review to take account of technical and political developments in the UK and the rest of the world.
Q3	Are the conditions that a preferred option must in due course meet, the right ones?
Response	The conditions are appropriate. There are clearly standards of health, safety, environmental, security and non proliferation that must be met. Some ongoing consideration of alternatives will be needed to ensure that the selected option is value for money as currently there are considerable uncertainties.
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 consider that it is timely to take a preliminary policy view now as it will help focus the technical work. The continuation of some work on alternative options is at this stage justified due to uncertainties and

	<p>some plutonium may not be suitable for conversion to MOX fuel. It is important that utilities in the UK who may procure new reactors are aware of the Pu policy and the potential for MOX fuel to be available.</p> <p>A preliminary policy will help focus the development of the GDF on disposal of irradiated MOX fuel rather than immobilised plutonium although there will be impure plutonium residues which may not be suitable for MOX fuel which will require disposal.</p>
Q5	Is there any other evidence government should consider in coming to a preliminary view?
Response	As noted in the consultation paper several countries have stocks of plutonium. We consider that it will be important for the UK government to keep up to date with world wide developments as these may impact on the UK strategy.
Q6	Has the Government selected the right preliminary view?
Response	<p>We support the preliminary view to use the plutonium in MOX fuel. It has the potential to meet the conditions set out in chapter 5.3 of the consultation paper. Value for money considerations will be very important in the ongoing work. Utilisation as MOX fuel does not foreclose the option of further use in a fast breeder reactor at a later date if the technology becomes commercially attractive.</p> <p>Chapter 4 of the consultation paper mentions the plutonium which is owned by British Energy. We support the suggestion that the management of this plutonium should be optimised with the NDA owned plutonium.</p> <p>Currently the financial analysis is favourable to the MOX fuel option but these must be regarded as preliminary at this stage and will need to be developed to a more robust position.</p> <p>There will be a number of significant technical issues which will need to be addressed as the work progresses, but none of them prejudice the preliminary view. In particular the poor performance of the Sellafield MOX plant (SMP) needs to be properly understood to ensure that a new plant operates much more satisfactorily.</p> <p>Much of the UK plutonium stock will have been in store for a</p>

	<p>prolonged time prior to potential use as MOX fuel. The ongoing work will need to consider the suitability of long stored material, containing significant americium, for fabrication into reactor fuel together with the inventories of higher actinides after irradiation. If chemical processing is required prior to fabrication into MOX fuel to remove americium or other contaminants the selected approach becomes less attractive. It is probable that some of the plutonium will require disposal and hence it is important to continue work on the immobilisation option. The consultation paper appears to have taken a rather pessimistic view on the use of a cement matrix.</p>
Q7	<p>Are there any other high level options that the Government should consider for long-term management of plutonium?</p>
Response	<p>No response.</p>