



# Submarine Dismantling Project (SDP)

Post-Consultation Report on the  
Site for Interim Storage of  
Intermediate Level Radioactive  
Waste

Annexes A to J

July 2015



Ministry  
of Defence



---

# Contents

---

- A Consultation Press Release
- B Consultation Document Map
- C Exhibition Adverts
- D Local Workshop Reports
- E National Workshop Reports
- F Submissions from Organisations and Elected Representatives
- G Feedback Forms
- H Emails and Letters
- I Advisory Subgroup Reports
- J Statistical Breakdown

# PRESS RELEASE

134/2014

16 October

2014

### **MoD confirms sites for submarine dismantling consultations**

Five UK nuclear facilities have been confirmed as potential sites to store waste from decommissioned nuclear-powered submarines. A public consultation process will now help to determine which site is selected.

The sites, which already hold radioactive materials, are either owned by MOD, the Nuclear Decommissioning Authority (NDA) or industry. They are:

- the Atomic Weapons Establishment sites at Aldermaston and Burghfield in Berkshire which are owned by MOD and run by AWE plc;
- Sellafield in west Cumbria, owned by the NDA;
- Chapelcross in Dumfriesshire, owned by the NDA;
- Capenhurst in Cheshire, which is run by Capenhurst Nuclear Services.

### **Philip Dunne MP, Minister for Defence Equipment, Support and Technology:**

**“When the submarines in the Royal Navy fleet reach the end of their lives we need to dispose of them in a way that is safe, secure and environmentally sound.**

**“This open and transparent public consultation process provides the opportunity to work closely with local communities near to potential sites to listen carefully to their views with the aim of delivering a solution that achieves these objectives.**

**“We value the views of those who have something to say about the Submarine Dismantling Project. All of them will be considered properly as part of our decision-making process. After consultation we will publish a report on our findings and after we have selected a site, we will explain why we reached that decision.”**

The Submarine Dismantling Project will oversee the disposal of 27 Royal Navy nuclear submarines that are due to have left Naval service by the mid 2030s and be defuelled, including 19 submarines that have already left service and are stored afloat at Rosyth and Devonport.

The submarines can only be completely dismantled once reactor components, which are categorised as radioactive waste, have been removed. The initial dismantling process will support up to 60 skilled jobs.

The sites named today are the same as those announced by the MoD on a provisional shortlist on 13 February 2014. Public consultations will start on 14 November 2014 and run until 20 February 2015. There will be a series of exhibitions and workshops close to all five sites, plus two national workshops.

The site chosen will be used for interim storage of reactor components until after 2040, when the UK Geological Disposal Facility (GDF) is planned to come into operation.

**ENDS**

**Notes to Editors:**

- For further information please visit:  
<https://www.gov.uk/government/publications/submarine-dismantling-project-interim-storage-of-intermediate-level-radioactive-waste>
- Or contact Hannah Carolin in the MoD Press Office on 02072 187 907

### **Consultation dates:**

#### **Aldermaston:**

17<sup>th</sup> November: AWE Recreational Society, West Gate, Plantation Road, Aldermaston RG7 4PR.

22<sup>nd</sup> November; 23<sup>rd</sup> January: Tadley Community Centre, Newchurch Road, Tadley RG26 4HN.

#### **Burghfield:**

18<sup>th</sup> November: Village Hall, Recreation Road, Burghfield Common, Reading RG7 3EN

20<sup>th</sup> November; 22<sup>nd</sup> January: Community Sports Association, James Lane, Burghfield, Reading RG30 3RS.

#### **Chapelcross:**

28<sup>th</sup> and 29<sup>th</sup> November; 15<sup>th</sup> January: Victoria Halls Complex, Downie's Wynd, Annan DG12 6EE.

#### **Capenhurst:**

9<sup>th</sup> and 10<sup>th</sup> December; 20<sup>th</sup> January: Macdonald Craxton Wood Hotel, Parkgate Road, Ledsham, Chester CH66 9PB.

11<sup>th</sup> December: The Village Hall, Capenhurst Lane, Capenhurst, Chester CH1 6HE.

#### **Sellafield:**

17<sup>th</sup> December; 28<sup>th</sup> January: Cleator Moor Civic Hall and Masonic Centre, The Square, Cleator Moor CA25 5AU.

18<sup>th</sup> December; 27<sup>th</sup> January: The Beacon Museum, West Strand, Whitehaven CA28 7LY.

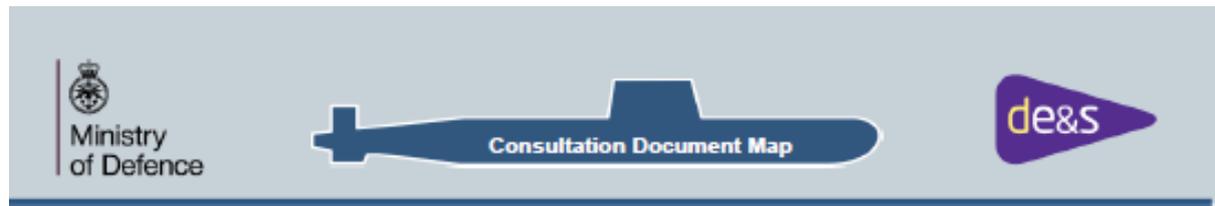
#### **Birmingham:**

6<sup>th</sup> January 2015: The ICC Birmingham, Broad Street, Birmingham B1 2EA.

#### **Glasgow:**

8<sup>th</sup> January 2015: Scottish Exhibition and Conference Centre, Exhibition Way, Glasgow G3 8YW.

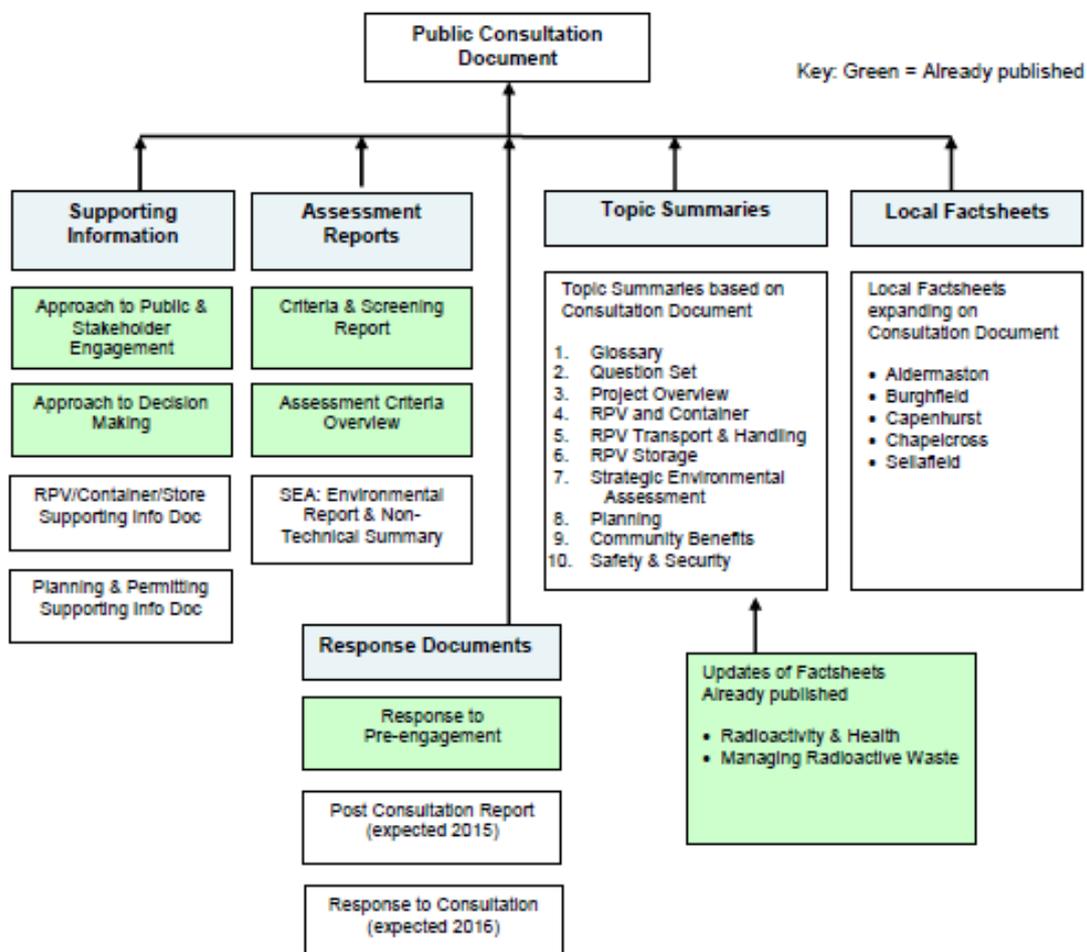
# Annex B: Consultation Document Map



F80 Issue 1.0

## Consultation Document Map

This Factsheet shows the full set of supporting documents available on the project web pages (see overleaf). Printed copies (including large print versions) are available on request from the project team.



# Annex C: Exhibition Adverts

## SDP PUBLIC CONSULTATION

**Ministry of Defence**

---

**The Ministry of Defence invites you to a public exhibition about its Submarine Dismantling Project**

This is an opportunity to find out more about our proposals for storing radioactive waste from the Royal Navy's nuclear powered submarines after they have left active service. The Submarine Dismantling Project is our programme to deliver a safe, secure and environmentally responsible solution for dismantling 27 defuelled submarines. This involves recycling the bulk of the submarine and safely disposing of the remainder. The disposal process includes storing certain waste, known as intermediate level radioactive waste, for an interim period until it can be transferred to a Geological Disposal Facility some time after 2040.

The interim storage site for this radioactive waste will be chosen from a shortlist of five sites, all of which already carry out nuclear-related activities. These are Aldermaston and Burghfield in Berkshire, Capenhurst in Cheshire, Chapelcross in Dumfriesshire, and Sellafield in Cumbria. The site selection process is at an early stage and we are carrying out a public consultation to gain feedback to help us choose a site from the shortlist. The public consultation will run from 14 November 2014 until 20 February 2015. During this time we will be holding public exhibitions at each of the shortlisted sites.

**The exhibitions for AWE Aldermaston and AWE Burghfield are as follows:**

<b>Venue:</b> AWE Recreational Society, West Gate, Plantation Road, Aldermaston RG7 4PR <b>Dates:</b> 17th November 2014 <b>Time:</b> 12 noon - 8.00 pm	<b>Venue:</b> AWE Community Sports Association, James Lane, Burghfield, Reading RG30 3RS <b>Dates:</b> 20th November 2014, 22nd January 2015 <b>Time:</b> 11.30 am - 7.30 pm
<b>Venue:</b> Burghfield Common Village Hall, Recreation Road, Burghfield Common, Reading RG7 3EN <b>Dates:</b> 18th November 2014 <b>Time:</b> 11.30 am - 7.30 pm	<b>Venue:</b> Tadley Community Centre, Newchurch Road, Tadley RG26 4HN <b>Dates:</b> 22nd November 2014, 23rd January 2015 <b>Time:</b> 11.00 am-3.00 pm (22nd Nov) 11.00am-5.00pm (23rd Jan)

Please come along to find out more about the project and the decisions we need to make. You will have the opportunity to speak to our project team and to express your opinions in person. We will listen to the views of communities and local people before we select the interim storage site, and all the comments we receive will be considered as part of our analysis of the options.

We hope to welcome you at one of our exhibitions, but you don't have to attend in person to take part. All the information is also available via the internet or by post and we will accept responses to the consultation by post or by email.

Have Your Say

If you would like to take part in a workshop to discuss these plans with the project team please complete and return the slip below. Workshops are due to run for 90 minutes.

I would like to take part in a workshop at:

AWE Recreational Society Aldermaston on Monday 17th November 2014:	<input type="radio"/> 1.00pm	<input type="radio"/> 3.00pm	<input type="radio"/> 6.00pm
Burghfield Common Village Hall on Tuesday 18th November 2014:	<input type="radio"/> 1.00pm	<input type="radio"/> 3.00pm	<input type="radio"/> 6.00pm
AWE CSA Burghfield on Thursday 20th November 2014:	<input type="radio"/> 1.00pm	<input type="radio"/> 3.00pm	<input type="radio"/> 6.00pm
AWE CSA Burghfield on Thursday 22nd January 2015:	<input type="radio"/> 1.00pm	<input type="radio"/> 3.00pm	<input type="radio"/> 6.00pm
Tadley Community Centre on Saturday 22nd November 2014:	<input type="radio"/> 11.30am	<input type="radio"/> 1.30pm	
Tadley Community Centre on Friday 23rd January 2015:	<input type="radio"/> 11.30am	<input type="radio"/> 1.30pm	<input type="radio"/> 3.30pm

**Name:** .....

**Address:** .....

**Postcode:** .....

**Tel:** ..... **Email:** .....

Send to: FREEPOST RSKJ-KRAH-YZRJ, Submarine Dismantling Project, c/o Instinctif Partners Ltd, 4th Floor, Dukesbridge Chambers, 1 Duke Street, Reading RG1 4SA. Alternatively, you can call 0118 983 9474 or email: [sdp@instinctif.com](mailto:sdp@instinctif.com)

Please tick the box if you would like to be kept up-to-date by email as the project progresses.

Submarine Dismantling Project

Advertisement published in Newbury Weekly News, 30<sup>th</sup> October 2014.

# Public consultation

14 November 2014 – 20 February 2015

## Submarine Dismantling Project: We want your views

The Ministry of Defence (MOD) is holding a public consultation about its Submarine Dismantling Project.

The Submarine Dismantling Project is our programme to deliver a safe, secure and environmentally responsible solution for dismantling 27 defuelled submarines. This involves recycling the bulk of the submarine and safely disposing of the remainder. The intermediate level radioactive waste is contained within the submarine's Reactor Pressure Vessel (RPV). After the RPV has been removed in its entirety, it must be stored for an interim period until it can be processed and sent to a Geological Disposal Facility, some time after 2040. This public consultation will help us to decide where the interim RPV storage site should be.

We are asking for your views on three main topic areas:

- the Strategic Environmental Assessment (SEA).
- the process and criteria being used to compare the shortlisted RPV storage sites.
- the shortlisted sites and the differences between them.

The MOD is taking its duty to manage the nuclear legacy of out-of-service submarines seriously. We believe that developing a solution now, rather than leaving it to future generations, is the responsible course of action and this is the aim of the Submarine Dismantling Project.

As part of our consultation process, we invite you to visit our exhibitions and take part in a workshop, which will be in your area during **December 2014** and **January 2015**. The exhibitions are an opportunity to find out more about the decisions we need to make about where the RPVs will be stored, to speak to the project team and to express your views. Copies of our Consultation Document will be available at the exhibition and can also be obtained from local council offices and libraries or downloaded from our website.

We are committed to seeking your views before key decisions on the storage site are taken and we look forward to welcoming you to the exhibition. In the meantime, if you need any further information, please contact the Submarine Dismantling Project team or visit our webpages – details are inside the back page of this leaflet.

This newsletter provides some background information on the SDP and invites you to participate in the public consultation exhibitions and workshops.

The following exhibitions are being held in your area:

**Venue:**

Cleator Moor Civic Hall and Masonic Centre, The Square, Cleator Moor CA25 5AU

**Dates:**

12noon – 8pm, Wednesday 17 December 2014  
12noon – 8pm, Wednesday 28 January 2015

**Venue:**

The Beacon Museum, West Strand, Whitehaven CA28 7LY

**Dates:**

12noon – 8pm, Thursday 18th December 2014  
12noon – 8pm, Tuesday 27 January 2015

We will also be holding independently facilitated workshops offering an opportunity for you to discuss the RPV storage sites and inform our assessment process. Please see the back of this booklet for more details and the booking form.



Yours faithfully

A handwritten signature in black ink, which reads "M. Wareham".

Rear Admiral Mike Wareham  
Director Submarines



Submarine Dismantling Project (SDP)

Newsletter

## Public consultation

## Booking Form

**I would like to reserve a place on a workshop to discuss the MOD's plans for the assessment and selection of the storage site for the RPVs.**

**Cleator Moor Civic Hall and Masonic Centre on:**

Wednesday 17 December 2014   
Wednesday 28 January 2015

**The Beacon Museum on:**

Thursday 18th December 2014   
Tuesday 27 January 2015

Please state your preferred time (workshops are due to run for 90 minutes) and will start at:

1pm   
3pm   
6pm

NAME:	
EMAIL or ADDRESS for confirmation:	

I would like to receive email alerts when there are updates on the project.

**FREEPOST RSKJ-KRAH-YZRJ  
Submarine Dismantling Project  
c/o Instinctif Partners  
4th Floor  
Dukesbridge Chambers  
Duke Street  
Reading  
RG1 4SA**

NB. You do not have to register to attend an exhibition unless you wish to take part in a workshop.



**Submarine Dismantling Project (SDP)**

**Newsletter**

**Annex D: Local Workshop Reports**

---

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Tadley Community Centre**

**22 November 2014, 11.30am**

**MOD representatives present:** Linda Eadie, Mark Ball, Stuart Patten

**Member of the public present:** 8

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

You are going to design a site in 2016 – what happens if you don't then get planning permission, as local authorities change and what they say now may be different from what they think later.

You are probably aware that we have a development protection zone (DPZ) of 3km around the site where houses cannot be developed. We are also on the border of West Berks and Basingstoke & Deane councils. A lot of residents have a concern around this.

Will there be any impact on the ONR DPZ? Many had hoped that this would be relaxed in the coming years. (*Our proposed building is within the licensed site.*) (EA representative commented: *Aware of all the constraints. This does not add to the risk on site. Simply, there is nothing that can be released from this, to increase or decrease the risk.*)

We would like to hear that from the regulator, the ONR. ONR need to be asked the impact on the DPZ.

Site operator has a 25-year contract. Are you going to consider this, given it is a 100-year project. (*We will be considering this for all sites.*)

Flooding is a concern, particularly at Burghfield. Will that make a difference in the assessments, and for the location of the store?

How long have you known that you were going to have to get rid of the RPVs at some stage? Presumably since the subs were built. Can't understand why you haven't got a geological site in place now so they can go straight to the GDF.

Can't see any real benefit to the local communities at any of the sites. Why would somebody want this in their area? Is there anything at all that would benefit the residents? (*Construction jobs mentioned.*)

Are we any different to any other country in the world in this, and if so why? Russia has many submarines.

(EA representative – *This solution is supported by regulators and it is an end-to-end solution.*)

You said these things are not dangerous, so why does it need to be put into a GDF and with the transport that this involves? (*Levels of radioactivity discussed*).

Could you quantify it, as you said you could stand next to it without much of an impact. What is the dose rate like compared to having an x-ray, say? (*Fact sheet available; half-lives explained.*)

It seems that as they are floating submarines they could be transported by sea. Why aren't we looking at transporting these by sea to the storage facility?

You mentioned the potential to mobilise contaminants when you are building. Is there more risk with sites as they have got this sort of work going on anyway? (EA: *History of the sites means there is contamination in the ground at some of the sites. So need to look at the potential for disruption on the particular site and that this is minimised.*)

Has anything been done to assess this at the current stage? (*No, but report has highlighted this as an area for consideration.*)

You mentioned possible shared storage. I thought you were only looking at one site: can you explain this? (*Not two sites, but looking at whether current developments could be used to store this in addition.*)

Seems logical that the ones in the south go to a store in the south, and the ones up north stay up north. (*Cost of store is the main thing.*)

An observation, as we have identified there will be some jobs benefit in build but not a lot of benefit to local areas. There should be some level of contribution to the local people in terms of infrastructure or local facilities, as this would be fair.

The majority of people affected by this will actually be in Hampshire, not in West Berks, so any S106 contribution should be split between the two and not kept within West Berks. So the benefit should come to both sides of the border.

There won't be much S106 for this development though, would there? (*As not much impact from the development then there would not be much of a S106 contribution.*)

The issue for Tadley is that as there cannot be any development due to the DPZ, then the area cannot get any S106 contributions.

Please give us some benefit.

Is there any plan to give some community benefits, so that sites may actually compete to get it? (*Interesting point regarding the DPZ issue.*)

In this area the site has been around for a long time and we have grown substantially due to this and yet we have not had the contributions to develop the infrastructure and this is what local residents are concerned about.

Residents are in the main quite apathetic and not really engaged. People have become more and more accepting of AWE and the jobs it provides, but there have been recent concerns about safety issues, but local liaison committees do not get many concerns raised. I thought there would be lots of people attending this so it will be interesting what the level of interest is.

Will the site go to other uses in the future, such as the laser facility, or will these things go to other sites? Will an ILW store affect this, is a concern.

Will ask the local town council to make a comment in this consultation and for other councillors to make comments.

The majority of the people here are in the Tadley area, rather than Aldermaston.

Apathy is about how people feel about AWE, really. What they don't know is that the issues they have often come back to the DPZ issues and the lack of S106 contributions that the area gets. Understand that there are restrictions to the way S106 contributions can be used. Issue is the knock-on effect from the DPZ.

Flip side to that is that in the future it would be unlikely that the Aldermaston site could be used for other things, such as housing. Or could this be possible, if the site ever stops being used in the way it is currently?

Nobody is suggesting we would want to develop housing on this site, but we do want enough houses for our local, young people to live in and at present this is not possible.

Would these sites just be for British submarines, or would you bring in Russian ones, etc? (*Just UK submarines.*) So this is not going to be a dump.

Are you generating any income from this? Does all the waste metal contribute to this? (*Recycling discussed.*)

There was a mention of minor changes to local roads. Do we know what works would be required on these sites, what the implications would be in the various sites in terms of the roads? When will we know what the routes would be?

There are dedicated high load routes across the country. How big are these actual loads? (*Sizes explained.*)

These don't seem to be particularly large loads, then, so I don't see a problem with that at all.

This is the thing that most residents are concerned about, is the impact on the roads, but it seems that we won't know exactly for now.

Presumably with these five locations you will compare then in terms of the safety performance, as there have been safety issues here that have not been handled as they should have been.

I very much doubt we will have a GDF site in my lifetime.

### **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Tadley Community Centre**

**22 November 2014, 1.30pm**

**MOD representatives present:** Linda Eadie, Mark Ball, Stuart Patten

**Member of the public present:** 9

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

What is the definition of Intermediate Level Waste? You have them stored afloat at present and it doesn't seem to be of much concern. How does this compare to other nuclear discharges? *(Half-lives explained.)*

What level of radiation is being given off? *(After 20 years, you could stand a metre away and only get 1 milliSievert.)*

Presentation of equivalents to x-rays, etc will aid understanding.

Where is the GDF going to be or is it now? *(DECC project. Not decided.)*

Would the location of this have an influence on the location of the GDF? *(An Environment Agency representative – set out the GDF selection process.)*

On the size of the store - is there the room locally to put this?

I am quite surprised, as although these are large sites they don't seem to have any available space.

Referring to this as the size of a third of a football pitch. A recent project at AWE encroached on to a recreation area, so I hope this doesn't encroach, as these facilities are important locally. *(A representative from AWE commented: Size set out in the context of the whole AWE site of 400,000m<sup>2</sup> and this would be 2,000m<sup>2</sup>. AWE is removing 80,000m<sup>2</sup> of buildings over the coming years.)*

Will MOD / AWE give guarantees that no local community facilities will be lost through the development of this?

Transport, at one trip per year sounds not much. What happens with this transport, could you explain what it would be like? Is this something that just goes on normal roads?

You can invent scenarios for an irrational attack, so what have you planned for?

Symbol of it seems to be the greatest risk, in terms of being targeted.

Quite shocked to hear that you exposed yourself to radiation and you mentioned men chopping pieces apart. How much more exposure are people going to be exposed to? I didn't know there were legal limits for this. (*Limits discussed. An Environment Agency representative explained minimisation of level of dose.*)

How much further exposure will all this cause?

Has one site got a better safety record or a better prospective safety performance for the future? (*This will form part of the selection criteria.*)

What about the evacuation procedures for sites? Some sites may be better than others for evacuations.

Are Burghfield and Aldermaston volunteering for this or are they going to be told they are getting it?

Presumably there would have to be some reward to the operators? (*There will be a contract put in place.*)

On emissions, these vessels would be stored with the packaging so what is the radiation coming from the building? (*Almost immeasurable.*)

On the consultation so far, this is the last opportunity until January. So how many people have been coming to the workshops, how has the community responded?

What is the benefit of this to the local people? How am I going to sell this to my local residents? Why should we have it and not somewhere else?

The bigger question is why are we still producing this waste? Why are there not people finding ways of powering submarines without nuclear power?

## **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

**Victoria Halls, Annan**

**28 November 2014, 1.00pm**

**MOD representatives present:** Linda Eadie, Andy Jackson, Mark Ball

**Members of the public present:** 2

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

The strategy for the RPVs is very similar for that for nuclear power stations. Technology is moving ahead, so a good idea to leave it as in 100 years technology would have progressed so that it could be handled more easily.

Makes sense to have it on sites with current nuclear materials. There appears to be a marginal impact from these RPVs.

Chapelcross has very robust reactor containers, with 12-foot thick reinforced concrete; even if an aircraft hit it there would not be a problem, so only concern would be if, say, a suicide bomber targeted these RPVs. They seem to be less robust than the current Chapelcross radioactive waste storage. *(Details of RPV and container set out. Possible scenarios discussed.)*

"I'm not overly concerned about this."

Question on the overall security, such as observation of the site. What would the security be to ensure safety of the site? *(Site security is a consideration. Each site will have security arrangements for current activities and the NDA would be responsible for considering this.)*

What would happen if a bomb were exploded by an RPV, such as for a dirty bomb. *(The likely impact discussed and the contents of the RPVs clarified. Differences to dirty bombs set out.)*

Possible threat from terrorists questioned.

Why not put it at Devonport, right next to where the submarines are? *(Babcock didn't offer the sites, as they don't have room to have the store at Devonport or Rosyth.)*

Sellafield must be high up the list for this, based on my own assessment. Is this right? I would put it at Sellafield.

With the increase we are having with extreme weather conditions, is this being considered? For instance are minor earthquakes and flooding considered? I was thinking about what happened in Japan. (*Design of the building discussed. There is a question for sites as to whether seismic activity needs to be considered for the site.*)

I would be much more concerned about the impact on schools and hospitals. If there was such an event this is not an issue.

Is the machinery available to move this around? For instance the transport vehicles and fork lift trucks, etc? At Sellafield the fork lift trucks are large, but not big enough for something like this.

Is this just going to be stored on the surface or sunk down or below ground?

Will the site be raised up at all, to protect for flooding?

I hope you go ahead and it all works out.

### **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

**Victoria Halls, Annan**

**28 November 2014, 3.00pm**

**MOD representatives present:** John Davis, Christine Bruce, Lucy Samuels

**Members of the public present:** 4

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Why did you prioritise Rosyth for removal of the submarines?  
*(Commercial site that has other uses planned.)*

Are you relying on the security within the current facility/site?

Why are you only shifting one RPV per year? *(It is the dismantling rate for the submarines.)*

If they are safe within these containers, why can't they just be left there until you have somewhere else to put them?

It suggests there are safety issues if you cannot just leave them at the sites they currently are.

There must be something about these containers that means you can't store them somewhere else, just like other waste such as boilers. What is it about these RPVs that means they have to go to a nuclear site?

Are the submarines not just stored where they are now? Why can they not just be kept there?

Is it less safe in the containers than it is in the submarines currently?

We are concerned about Chapelcross being used for waste coming in from outside. We are in the position where we have finally got the site being decommissioned and we will see the end of it and environmentally the area will be improved. Now it is like the beginning of the whole nightmare again. More and more waste could be brought in.

We watched the plane come down at Lockerbie and were concerned about it hitting Chapelcross.

The local people will probably just let this happen without getting involved.

The local politicians have all been involved in Chapelcross.

We have got the nuclear waste there and it has to be disposed of, so we have to store it in the safest and most economic way.

Discussion and argument about sites, with view expressed that there are sites down south that are already storing this waste and will be into the future, so why not use them when we are trying to get Chapelcross decommissioned?

If you introduce the ability to take waste from outside then you are setting a precedent that could lead to even more waste being brought in.

Magnox could then start taking on other people's waste for commercial reasons.

Emotional point is that we have already suffered enough in this area. It is important to also take on people's emotional point of view.

There are other ways of looking at it. It is there, it is our waste, the UK's waste, so we have to get the safest and most economical place to put it regardless of where it is.

Concerned that it may be there beyond 2040 as there could be delays in getting the GDF developed. There is uncertainty around this and we don't want this delaying the decommissioning of Chapelcross.

Magnox is a commercial operation, they are doing it to make some money out of it.

What is the safest around the moving of the RPVs? The way it is being transported with escorts, etc shows that there must be a safety issue with this, so what is that?

What possible risk could there be, other than disrupting the transport for publicity reason? My view is that there is actually no risk to this.

It would be best to take it the shortest possible route, a shorter distance, so take it down south.

What proportion of the cost is the transportation? Quite small, I would think. *(It would not be a huge amount; the containers are an expensive part.)*

A representative from SEPA commented: If it were to be stored at Chapelcross then SEPA would monitor it. SEPA inspectors would be there and making sure that it is OK, under the authorisation to do this. The site would have to apply to change its authorisation. SEPA would then go into public consultation and this would be different.

I don't have any views about trusting the MOD. It just all suggests that it is about something more and I am concerned about this. Just look at Sellafield, which has got more and more and it is now fit to bursting.

SEPA consultation would be used to inform politicians to make the final decision.

The nagging worry is that it is difficult to get an unbiased view in this area, as Chapelcross has been so important in the area providing jobs.

This particular thing in itself seems to be a pretty safe bet, and every other possible request in future would have to be dealt with separately.

Nobody is saying that this is unsafe, but concern about the precedent for Chapelcross.

This leads to the wider discussion about whether we should have nuclear power, which obviously isn't the Scottish Government's view.

There was a discussion about the future of Chapelcross and of nuclear power.

When you look at some of the possible future plans for the site, one was a wood burning power station that would have involved 250 lorry loads per day, so you have to take these sort of things into consideration too. That would not have been wanted.

A new building for 40-50 years may be a good thing. I don't think it could be used as a new nuclear power station as you couldn't get the water.

If you take the RPVs into the storage containers, supposing you were next to it without any further shielding, how much radiation would you receive?

It is not so much to do with safety, but it is to do with Chapelcross not becoming a dumping ground.

### **Post-it Note comments**

Comment after the workshop by a former worker at Chapelcross that the Civil Nuclear Team is no longer in place at Chapelcross, for security arrangements, and so the presentation should note this. Currently the presentation says the Civil Nuclear Team would review security arrangements.

## **MOD SDP PSE**

### **Local Workshop Notes**

**Victoria Halls, Annan**

**29 November 2014, 1.30pm**

**MOD representatives present:** John Davis, Christine Bruce

**Members of the public present:** 3

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Would your waste be in a separate store to the Magnox waste? (Yes.)

Your first snag is that the majority of people just will not believe you, and you will get things like Three Mile Island quoted at you. There is a similarity with the public concerns around fracking. Public panic is an issue and it will not be easy to sell this.

The fact it is Intermediate Level Waste, where is that on the scale of things? For example, in Aberdeen there is high background radiation, so how does this compare? What are the radioactive levels? (*Outside of the store there should be no increase in the levels.*)

We were here when Chernobyl happened, and there were concerns even here about the radiation levels following that.

If this is so safe, why can't it be left where it is now? Or even put in the middle of a city?

I basically support what you are doing, just with a question about the geography. You are 'trying to find a bunch of mugs' willing to take this.

This is the old NIMBY thing, with local communities being concerned about lots of things like this.

You mentioned other sites previously considered, so I've got a suggestion, why don't you take it to South Georgia in the South Atlantic, as there are no neighbours and it could easily be shipped there? A SEPA representative commented: *There are international treaties to stop the dumping of waste abroad.*

We've just had the referendum and there may be pressure from the SNP for another vote. Does that make any difference to the considerations?

If every county council were to say no, then what would you do then?

Wasn't there a row recently in Cumbria around this? (*GDF situation explained.*)

A SEPA representative commented: *Previously Cumbria had a veto, but the rules have now been changed.*

Seems strange that if you don't get the decision you want then the rules are just changed. (*These plans would go through the normal planning process.*)

So basically it will just be like a huge warehouse?

On transport, the number of axles on the transporter shown appears to be too few for the load, as I think the limit is 10 tonnes per axle. What is wrong with the railway?

Is there just going to be one location for the whole of the UK?

There is an awful lot of sea between Devonport and Chapelcross, so couldn't a sea route be used, perhaps to Barrow? Devonport is a very long way from here, so surely sea transport would be cheaper.

The thought of one of those things on the road for 400 miles is troubling.

There is talk about replacing Trident, so will my grandchildren be here again in many years time to discuss what should be done with them?

If we didn't replace Trident then we wouldn't need this.

So are all these Trident submarines? (*Various submarine classes explained.*)

Talking about people's perception, this will be a big, obvious building, so will this put people off coming to buy houses here in the future?

We desperately need development in this area, so would that put people off coming? It is not just the visual impact of it, but it is the perception of it.

I think they should develop an energy from waste plant here at Chapelcross to process Scotland's waste, as it could be brought in by rail and there are not many people in the area.

Would you landscape the site with trees around it?

So at the end of the day you would get one of these loads per year.

Thank you, it has been quite interesting.

## **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Macdonald Craxton Wood Hotel**

**9 December 2014, 1.00pm**

**MOD representatives present:** John Davis, Mark Ball, Andy Jackson, David Wilcox

**Members of the public present:** 11

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Is this the first presentation given on this project? *(Yes at this site, but other sites have had presentations.)*

Quite often when the public are consulted it can be seen as 'a sop' as a decision has already been taken. Is this the case?

A question on the differences between Scottish and English policy: how can that affect a substance, as it is the same wherever? *(Scottish policy outlined.)*

It says 27 defuelled submarines are for dismantling, so how many submarines do we have that are not being dismantled?

When the submarines are designed and built, is this dismantling taken into consideration? *(In the earlier submarines it was not, but now we do consider this.)*

There is also the cost involved, as there is an enormous cost to this.

Have you bothered to check on other countries to see what they do and found which is the most cost-effective?

I do think that when it comes to budgets, it doesn't just come out of thin air, it comes from our taxes.

I have read so many times about schemes the Government has come up with and spent a huge amount of money on them and then they've been scrapped. I want to be sure that things have been well thought out.

Do we know where the GDF site is going to be? *(No.)* So in other words it hasn't been started?

Can I ask about the timing of all this: you talked about the numbers at Rosyth and Devonport, so really we are looking at around 20 years to dispose of those. So why can't we wait, as the GDF will nearly be available by then? This would make sense.

I think that by doing it this way you are taking pressure off the Government by saying that you can leave it for another 100 years, so if it was left as it is then there would be more pressure on the Government to sort it out. "The transportation alone frightens the life out of me".

We've got the 19 submarines here, what is to stop any foreign countries bringing their waste here for storage? (*International treaties mentioned*). So the UK can't be a dumping ground? (*No.*)

Where do you live? Would you like it in your back yard?

Who will be transporting it? Will it be private companies? (*Container design and testing discussed.*)

Why will it be just one per year? (*Dismantling process discussed.*)

We already have a big fence for security around the site, so will we have any more fencing added on? (*A CNS representative commented: There will be no additional fencing.*)

And what about the security of transporting it up?

Why can't it come up by sea? It could come by sea up to Birkenhead and then in from there. (*The assessments of different transport methods set out.*)

What's the life of the hull of the submarine? (*It depends on how often you maintain it.*) So what difference is there in price to towing it out to sea and sinking it? (*International law bans this.*) Why not, if the submarine hull can last? Is it not allowed anywhere? You'd think you could just stick it in a hole in the seabed in a container.

Do you think it will have any impact on property prices? (*It is a modest store in comparison to the rest of the activities on site. A CNS representative commented: Although it would be noticeable on the site it will not increase radioactivity off site and will not add to the risks.*)

Comment made that the site has been there for 60 years so it won't be any different.

Is it just 1% of the submarine? So how do you recycle the other 90%? And would you then sell it? Will this cover the cost of the store? (*It will help offset the cost but it won't cover it.*)

I am deeply concerned about the possible waste of public money. (*Scrutiny of expenditure discussed.*)

Thank you for explaining this, but I doubt any of us will be alive at the end of this.

Of these five sites, is there a cost differential between the sites? Have any been assessed yet?

Who will be notified when the transportation will take place?

How long is the construction going to go on at the site, if we get it? *(We have assumed a worst case of up to two years.)*

How does this compare to the current construction work on site? *(A CNS representative commented: It will be a lot quicker to build than the current build work on the site, as it is not as complex.)*

Where will it be on the site? *(A CNS representative commented: The area we are currently looking at is not on the railway side but on the other side where there is some land that seems appropriate, but a site has not been finalised yet.)*

What about the part of the building for repackaging – what will be there? *(A CNS representative commented: it is just extra floor space in the store at present.)*

The repackaging is the bit that bothers me. It is only a steel shed. *(Safety, etc discussed. Regulatory requirements at the time set out.)*

And you've already got the TMF site there. *(A CNS representative commented: We would need to be relicensed to do this.)* 'That was what I had hoped.'

Will you be releasing the figures about where you have decided and why? *(Yes.)*

Will the cost be a major point in the decision? *(It will be one of the factors.)*

I can't see the cost differing too much between the five sites. *(We are looking at the whole life costs.)*

How long is the shed itself expected to last, and why isn't it camouflaged? *(A CNS representative commented: It would have to be a colour and style to be in line with the rest of the site. This will be part of the planning.)*

I can't get the GDF business out of my mind. Why can't we kick off putting the GDF together now? We could avoid the massive cost of this project.

This isn't a problem that has sprung up, it has been known about for years and years. So why hasn't this been sorted out?

Why don't the Government just get the GDF up and running? *(Even if we had a GDF site decided tomorrow we would still have to do this project as it would take so long to develop and this project will save money.)*

Doesn't Capenhurst already store materials like this? *(A CNS representative commented: Yes, Capenhurst handles similar materials to this.)*

So who is Instinctif? Why do we need you? *(This was set out.)*

I really have found that consultants cost a lot of money and this money needn't be spent.

I will be highly surprised if this doesn't end up in Capenhurst.

**Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Macdonald Craxton Wood Hotel**

**9 December 2014, 3.00pm**

**MOD representatives present:** Linda Eadie, David Collier, Christine Bruce

**Members of the public present: 6**

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

What has happened to the spent nuclear fuel? *(The submarines have been defuelled already.)*

Have you got to cut the submarines apart to get the RPVs out?

Regarding the need for planning before any RPVs are removed, do you mean when the underground store has planning or just the intermediate store? *(When the intermediate store has planning.)*

So they will possibly be at the interim store for 25 years? *(Yes.)*

So there is no real end date?

Could the store be for 100 years then?

How are you going to make the decision? Will it be purely on cost?

Will the RPV plate, replacing the RPV head, be welded on or bolted on?

How much does the RPV weigh? *(About 50 tonnes.)*

Are you going to own or rent the trailers used to transport them?

After repackaging will it be a smaller and lighter package?

How big will the store be? *(Approx. 45m x 45m.)*

How high will the store be? *(Not currently known, but an estimate is 15m.)*

It will be like a small supermarket then?

If the total problem you have is only 0.2% of the whole lot, why are you going for a separate solution?

It terms of volume, you have something that is much smaller than is currently being handled at the old decommissioning sites then?

Regarding the regulators access to the site, will they have separate access arrangements within the site? *(No, it is about who will be able to audit and when.)*

Will the civil nuclear police look after the store?

What will the dose rate be inside the store?

If you have an RPV, then the highest dose rate would be standing right next to it, so you must know what that level would be? It seems to me that the dose rate will be pretty low.

What is the half life? *(For gamma emitters it is 5.3 years, for beta emitters it is much longer but these are easier to protect against.)*

Given the weight, they are not likely to be stolen, are they?

So they won't have the same set of security as warheads with armed police, etc?

Will you just have a night watchman for security then?

If this was built at Capenhurst do you know where on the site it would be and whether there is land available? *(The exact site is not yet decided.)*

What is the view of the management of the site, do they want it? *(A CNS representative commented: We have a site that we believe is appropriate and yes, we do want this store.)*

Talking about the access, you will struggle to get 90-135 tonnes along the road, given the railway bridge and the narrowness of the road. You would have to close the road. There are some roundabouts that I don't think it would get around.

The construction traffic for the TMF is not allowed through the village. *(A CNS representative commented: This is due to the volume of traffic, whereas for the RPVs it is only one per year.)*

The document says about the transport routes for the containers and that they will not come along certain routes. Can you explain this? *(Potential routes explained.)*

There is a sharp corner on the A51, isn't there? No, that's the A540.

The double roundabout needs to be considered for construction traffic.

There are no roundabouts or bridges on the A540. This will need checking.

There are quite a few bends on the road to consider. *(This is on Capenhurst Lane. The proposed RPV route appears to be from the A494, on to the A540 and then on*

*Capenhurst Lane and through the village. A CNS representative commented: It is a little bigger than current loads, but only slightly bigger.)*

Bringing such a large load throughout the whole of Britain will cause disruption, so have you considered transport by sea? Airbus uses the sea route for large loads.

Twenty-four years ago I had a letter printed about British Nuclear Fuels and the head of BNFL said that under no circumstances would any nuclear reactor ever be brought to this site. Now you are going against this. *(This is not a nuclear reactor; it is a piece of steel.)*

Do you monitor the Rivacre Brook for nuclear discharges? *(A CNS representative commented: Yes, the EA and the site monitors this on a regular basis.)*

The brook used to be very low but now after rainfall it rises rapidly and my house is now in a flood area because of this and has been flooded. With more and more concrete on the site this is going to get worse.

This is an Environmental Impact concern.

Regarding ambient radiation levels, do you have similar materials on the site currently? *(A CNS representative commented: Yes, we have similar materials. Workers have very, very low doses of radiation and I wouldn't expect any increases outside of the store.)*

MOD has announced that two Trafalgar class submarines are going to be stored at Faslane, so where are they going to be cut up? *(Faslane will be their operational base, Devonport will be their eventual storage site.)*

If and when it does come to Capenhurst, what will happen to the construction materials? Will they be taken offsite or kept on site? *(A CNS representative commented: The site will be carefully sampled for contamination.)*

What is the commercial interest for CNS to take this on board? *(Any site will only be in it for business reasons. A CNS representative commented: We are expecting that there will be a return from it and that will be the subject of negotiation. If the return isn't there we won't do it.)*

URENCO is up for sale, so they may not own the site so you will have to deal with the new owners, won't you? *(A CNS representative commented: The three Government shareholders are considering selling their shares, but that doesn't change URENCO's ownership of the site. We have contracts on the site for the next 100 years so I do not expect anything to change.)*

You said there will be a Post Consultation report in 2015, so can we get a copy of this?

You said this will give a recommendation for the site, so who actually makes a decision on the site?

What if none of the five sites wants it? Or the people around the sites don't want it. Will you put it in your back yard?

Each site will need a similar storage facility so there shouldn't be much difference in cost. The cost of transport may well have some impact in the economic cost of the project. Do you know the costs?

Do you think any of the sites will need major changes to the roads around them?

I'm wondering about the process you are going through from here on. You will need to come up with all the figures for the sites. How long will this take? When will you be ready to make a proposal?

Where does the local planning process come in to it? *(We are seeking to understand the planning process now for the project timescales.)*

Are you expecting the local planners to support the plans then? *(Planning is a risk for every site.)*

My guess is that this is a fairly small impact building on these sites, so I'd be surprised if there would be any planning issues. It is not a very big building. There are already much bigger buildings at Capenhurst.

You must be very clear about the background radiation levels from this to get public support. I would have liked this to have been clearer today. You should have a fair estimate of the radiation levels there will be from this and comparisons to other radioactive sources, such as the background in Cornwall, to reassure the public.

My problem is with the words 'moderately low'. There is a need to reassure people.

So you can't tell us if there are tonnes or grams of Cobalt 60 in there? *(We have modelled this. The reactor modelling was explained. A CNS representative commented: The transport containers are being designed for the worst case.)*

Are the transport containers recyclable or, as I believe, are they also being used for storage of the RPVs? *(Yes, for storage.)* My concerns are alleviated by this.

Are you the first ones in the world to do this, or have others done it?

## **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Macdonald Craxton Wood Hotel**

**9 December 2014, 6.00pm**

**MOD representatives present:** Christine Bruce, John Davis, Lucy Samuels

**Members of the public present: 2**

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Was dismantling of the submarines thought about at the beginning when they were built?

Has the GDF storage facility started? *(No. GDF status explained.)*

You said that originally dumping at sea had been considered but that it is not possible now. What if things change again and the GDF wasn't possible, would there be a third option? *(Scottish position explained, with a near surface repository strategy.)*

There are power stations producing similar waste. What is happening to that?

Is that power station waste being stored on site then? Will all that end up in the GDF?

What happens to the RPV before it goes to the final storage location, are they going to cut it up here? *(The opportunity to dispose of whole is being looked in to. Size reduction could be needed.)*

Would size reduction be here? *(This is not assumed. In many years time size reduction will be easier due to the reduction in radioactivity.)*

For storage, does it stay in the container it is transported in? *(Yes).*

On the site list, is this a preferred list in order of preference? *(No).*

Can you tell me what goes on at Capenhurst? CNS – uranium enrichment, the new facility being developed and other activities explained.

It all seems perfectly safe. Obviously there is radioactivity at Capenhurst already.

Finally, there is the story about Sellafield and the pond where things were disposed of. This isn't going to turn in to that sort of pond is it? *(No.)* CNS – Things weren't done as they should have been before. That is a really difficult problem Sellafield has to deal with. Our regulators would not allow us to do anything like that now.

**POST-IT NOTE COMMENTS**

None.

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Macdonald Craxton Wood Hotel**

**10 December 2014, 1.00pm**

**MOD representatives present:** John Davis, Mark Ball, David Collier

**Members of the public present:** 6

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised. MOD SDP Project –

The environmental assessment slide is very vague, about minor effects and no significant impacts. How do we know what this means? *(This is a summary at this point, more detail would come in the planning process.)*

These proposals are just in case Scotland goes independent.

Are there any radiological issues or discharges?

When the building is there is it going to create any noise or vibrations during the storage phase?

Basically you are just going to build a steel-framed storage shed to hold these?

How do you measure the difference between High Level, Intermediate Level and Low Level Waste? Is it Becquerels? *(Yes. All Intermediate Level Waste will have to be stored until there is a long-term facility.)*

Didn't we used to send off our radioactive waste to Europe for reprocessing? *(You can't dispose of waste in other countries.)*

Whatever the level of waste are they all in the same containers? *(No. Containers are different depending on the type of waste.)*

For containment, does the RPV need to be in a sarcophagus, a shielded container?

Will the RPV inside the container be inert to avoid any corrosion taking place? *(Yes, the storage mechanism was set out.)*

Are you going to maintain an inert atmosphere inside the RPV during its storage? Will it be hermetically sealed? *(Yes.)*

Will there be any testing done of this? Will this be a spot test or a continuous purge test? Is there any potential for having to reseal the containers?

You are telling us it will just be stored but what will be done to monitor it? What checks will be done to ensure there is no deterioration of the containers over this time?

As it is a long-term storage this is a concern. *(Some of the radioactive nuclides decay is over a long time, but these are beta emitters. A CNS representative commented: The radiation decay is an important point.)*

They have been stored a long time, so were they defuelled twenty years ago?

Have you discussed the possibility of terrorist attacks, as they are being stored above ground? Why not put them below ground?

We have already got this nuclear site on our doorstep so this will not change things. *(This would not add to the risk on the site. A CNS representative commented: It would be a very strange terrorist who targeted this as they would get no impact from it.)*

Regarding road transport, you say possibly some minor changes to road layouts. What steps would be taken to improve Capenhurst Lane, between the A41 and the entrance to the site? It is a very narrow lane.

You couldn't move 135 tonne loads along Capenhurst Lane.

I heard the bridge couldn't take the weight, is this right? *(A CNS representative commented: It is more an issue about the length of the vehicles rather than the weight.)*

Will the route be through the village?

The main thing residents are worried about is how it would be brought into the site, as it is a very narrow lane with bends. The impact on us is very concerning.

Will we get all these road details before a contract is agreed? *(In the planning phase this will be looked at in detail.)*

Does CNS already have ILW on the site? *(A CNS representative commented: We do decommission buildings and produce waste materials on site and some of it is ILW. However, some of the by-products on site would be classed as Intermediate Level if they were a waste, but they are not seen as a waste but as a potentially useful product. We have tens of thousands of tonnes of this on site. This is fairly standard for us. This is a small, a tiny increment on what we are already dealing with on the site. Plus it is being stored in the transport containers. It is fairly straightforward, pretty easy stuff for us.)*

How and why was nuclear power found and used? Are there any nuclear subs still in use? Do they have a lifespan? *(A CNS representative commented: For submarines the amount of power you can get out of such a small power plant is why these are used and they do not need to be refuelled.)*

On the size of them, if one were in this room how big would it be?

You say the GDF will be ready about 2040, let's say 2050, and the storage building is designed for 100 years. Who pays for this and is the money ring-fenced?

Lets say CNS went out of business, who would then be responsible for the storage? *(They are still the MOD's RPVs and we would have to look after them. A CNS representative commented: We already have contracts for 100 years from the UK Government.)*

If you put the facility at CNS, does it change the licensing of the site for storage? *(A CNS representative commented: No.)*

Does it impact on the local authority plans for housing developments in the area?

What is the current cost of maintaining the submarines at the two bases? *(Not sure, but it is several million pounds per year.)*

The Dreadnought is now 50 years old. I am amazed you have actually kept them floating this long.

In the document it says it will be taken to a UK ship breakers for recycling. Many ships have been taken abroad, to Egypt. Will this be kept in the UK? *(It would be a UK ship breaker for security reasons. There are four possible ship breakers.)*

On the size reduction facility, if this were to be at Capenhurst would this involve another consultation and planning application?

It is quite easy that when someone has a contract further things are then done without us hearing about it. We want to be sure that if a size reduction facility is planned then we should know about it and be consulted.

Over what period is the dismantling going on? Is it 1 per year?

Is this one of the favourite sites for you to pick? *(We don't know yet. This is a transparent process.)*

By 2040 will the containers still be Intermediate Level Waste by then or a lower level? *(A CNS representative commented: Yes, Intermediate Level.)*

One thing for Capenhurst, with the alarms that go off we do not know what happens. What is this? *(A CNS representative commented: Yesterday there was a test of the emergency response on site, hence the alarms.)*

Wouldn't it have been cheaper to use the site itself for this consultation exercise rather than the hotel?

## **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Macdonald Craxton Wood Hotel**

**10 December 2014, 3.00pm**

**MOD representatives present:** Christine Bruce, Linda Eadie, David Collier, Lucy Samuels

**Members of the public present:** 16

#### **MOD SDP Project - Public Consultation: Capenhurst, 10 December 2014, 3pm Workshop Notes.**

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Is Chapelcross ruled out, with the possibility of Scottish independence? *(There is no basis for the Scottish Government to stop this currently. There is a risk associated with this.)*

If you were to choose Chapelcross I don't think you'd find them to be very friendly in Scotland.

This is the first we have heard about this. How out of use is the Capenhurst site? *(A CNS representative commented: It is very much in use and an extremely active site. It is very important to the global nuclear industry, with about 1,500 people working on the site. An overview of activities on the site was given. This would be quite a small addition.)*

So Capenhurst would be the ideal site then, if they are already dealing with this sort of product? *(Other sites are also doing this.)*

How would this affect local roads? The approach roads are rubbish. Have you considered using a new railway spur line? *(We have looked at road, rail and sea transport.)*

Surely it is not as big as the Sellafield containers that go on the roads?

They have flattened the new mini roundabout so that can be driven straight over.

We are concerned about access because it is difficult. Are you thinking of putting a new way in to the site?

Assuming it is road transport, is the length of each individual journey of relevance, as with Capenhurst every journey would be around the same distance, whereas other sites would have some long and some short journeys?

In another 30 years or so you would be moving these off to the GDF, so we are looking at 2 transports. If Rosyth & Devonport have the nuclear licences, why don't we just store them there? If the store is only 45m x 45m then surely you could fit it on these sites?

If you are looking at the GDF, then you must have a shortlist for this so can that be taken in to account for the transport?

A lot of radioactive material is already at Sellafield, so if you had it there you could avoid the transportation.

Are you going to cut them up then? *(We can repackage them and may need to reduce the size for the GDF.)*

What will happen to the level of radioactivity during the 20 years of storage?

If the GDF isn't ready on time, will they just be stored at the chosen site for longer?

Is one factor the longevity of the site? Are you allowing for the GDF taking considerably longer than 2040? *(Yes.)*

I would imagine a reasonable level of operations at the site is important so that it has the infrastructure in place for the long term. Is this right?

Will the building of the new town off Ledsham Road (2,000 houses by Redrow) come in to consideration for the environmental impact of this?

We in Great Sutton have been nearer the Capenhurst site for the last 40 years than these new houses will be. *(This will come in to the Environmental Impact Assessment.)*

There is a flooding issue there, which Redrow are trying to deal with. This needs to be considered.

In terms of what is already stored and processed there, is this down the scale?

We have been living with this for 40 years anyway. If you are just adding a bit more to it, then it has never previously interfered with us anyway.

Will the MOD still be committed to this, because they aren't always?

Is there a problem where they are stored at the moment? *(No, but it is costing us to keep them there.)*

It is not down to concerns about where they are now stored, then, so is it just about finance?

This is all from 30 years of hindsight and things haven't been very quick so far.  
*(This was the subject of the previous consultation and the position we now have is a considered position.)*

## **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Cleator Moor Civic Hall and Masonic Centre**

**17 December 2014, 1.00pm**

**MOD representatives present:** John Davis, Mark Ball, David Collier, Andy Jackson, Christine Bruce

**Members of the public present:** 6

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Related to Sellafield, much of the nuclear fuel arrives by rail from Barrow. Are you planning to use this route, as I can't see it mentioned? It seems rail transport is the best for nuclear fuels on safety grounds, so thought this would be the best method.

If you have road transport, this will be a large thing coming down our narrow, not very good roads won't it?

What speed would the vehicle do? *(To be assessed, regulations say a max 40mph.)*

It is going to cause massive hold-ups on our roads, so would you advertise it in advance?

An alternative route around here means making a decision about 90 miles away to avoid the delay, as there aren't alternative routes nearby.

Observing this sort of thing in East Anglia, mainly these transport movements are done at night when there is little traffic around.

This facility is for these 27 RPVs – is it just for these 27 or will there be more coming along later? The GDF site hasn't been decided yet and may take longer. Nobody has offered a site, and so nobody has any idea where the GDF will be.

When you dispose of this thing, will it then be too big to go in to the GDF? *(Size reduction facility discussed.)*

You'll have to build a full nuclear site to do the size reduction, just like they have at Sellafield already.

As we speak there is stuff being moved to Sellafield to be dumped, so what is this consultation process about? Is it because they are so massive? We are not usually consulted in this way.

Is it 17 submarines and 27 RPVs? Is this right? *(No, 19 moored up and 8 subs still operating.)*

So how do you make your decision? There will be this number of people at these events, and the others you are doing, so will it just be on what they say? Is it just the ones who make the least fuss? *(The various other contributory factors were set out. Scotland policy issue mentioned.)*

Why should we have to store Scotland's waste?

I think the concern here is that we could be regarded as the soft option, given we have 70% of ILW here already and this is only 0.2% more.

We are not really bothered about the radioactivity, but the impact on roads, etc. It is that we are always the soft option and this is another nail in the coffin. The same as with the GDF, where we are seen as the soft option.

Just because there aren't many people here doesn't mean much. Whole towns depend on Sellafield. People are used to having it here. There are people afraid of it, but you get used to it. That is why you don't have that many people here.

But you'll get protests at Aldermaston, won't you?

The main bottleneck is the political will regarding the GDF, not the technical aspects. In Derby they are perfectly capable of handling very large loads. It is a political hot potato. You have the road transport issue with the lack of investment in the road network around here. Has the possible new nuclear reactor and this all been taken into account together? My fear is that it could work against Sellafield.

On the economic impact of it, I appreciate Sellafield is probably the most expensive of the sites. Which would be the most cost-effective and also in terms of local stakeholders, in terms of benefit, jobs, etc?

What financially is in it for the community? Will there be some benefit to the local community to take this, being quite frank? *(We don't envisage providing community benefits, but we will go through the planning process.)*

Has anybody done any calculations on the half-lives, etc, before it is cut up? I'm aware that components can get very activated. You could design a remote controlled system for dealing with it.

Dreadnought – is that one of the ones decommissioned? *(It has been decommissioned from service.)*

You said the fuel has been removed, is that at Sellafield or is that covered by the Official Secrets Act?

Is there any radioactive build-up in the steam generation system of the submarines? *(Yes, some but LLW.)*

Will it effect the steam turbine blades? (No.)

Looking long term I wondered if this project could act as an intermediate facility to cut up other radioactive waste? (*Size reduction facility is not within the remit of this project.*)

Would you also consider somewhere more central for it, given you will have to transport it again to the final storage facility?

Is there room for this at Sellafield?

A lot of the problem with this is public confidence and you have all the issues that have gone on at Sellafield, with the radioactive pools, etc. For the long-term disposal facility you just need for people to be confident that something buried in the ground will be safe and the local community will be compensated for the blight it will cause.

The thing that strikes me is that this is just a pinprick on the whole thing, yet we have not had any consultation on any of the other things going on at Sellafield. This is essentially insignificant compared to what is at Sellafield and the GDF plans.

You could end up with this as permanent storage, given the way we are going.

This is a lot safer than a lot of the interim storage facilities already on the Sellafield site.

So is this a state of the art storage facility? (*It is a relatively simple storage facility.*)

I wonder why we were so against a GDF in this area? Given all the problems with birds going in to the pools at the site, etc. The sooner it gets removed into an underground facility the better.

There is a lot of concern that the geology in this area isn't the best for the GDF store, but it is the most politically expedient site. Other areas are better geologically.

The parish councils in Copeland are totally opposed to it and opposed to Copeland taking the decision. You are getting the flak because of that mistrust.

Improvements to the roads south of Sellafield would be much more beneficial.

I don't think you'll actually notice a small building like that at Sellafield.

### **Post-it Note comments**

In the absence of any Geological Disposal Facility, provision has to be made to store this material forever. The UK needs a GDF.

Sellafield is by far the best site for disposal on all grounds. I have lived in the area for 16 years and know there is wide local support for activity and expansion at Sellafield.

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Cleator Moor Civic Hall and Masonic Centre**

**17 December 2014, 3.00pm**

**MOD representatives present:** Christine Bruce, John Davis, David Collier, David Wilcox

**Members of the public present:** 6

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

You said foreign sites are ruled out for security reasons, so what about the US? They provided the technology originally so presumably it is not an issue with them.

(Prospect Union rep) Is there a community benefit package to go with this? (*Little impact, but it would go through the planning process.*)

Most people outside West Cumbria don't realise the impact it has on the area. The public and the community will say we don't want them here.

It sounds to me that it will be a modest shed and low level radioactivity, though.

What did Copeland Council say?

I understand it is a moderately sized shed, but it is just another one. We currently hold the biggest concentration of nuclear waste here, but the point is this is another one.

How are you going to transport these things around the country: you said by road? This isn't the best around here, as roads are single carriageway from Penrith to the site. We need investment in our infrastructure to be able to cope with this and with the prospect of new build nuclear power. This won't fit on single carriageway will it?

Did you consider building stores at Devonport and Rosyth to keep them there?

In Scotland they are anti-nuclear and don't want this; what if people in England say the same and say Scotland can have their waste back?

From the Sellafield Workers Campaign we want new nuclear build and more things and we are expert at dealing with this. We want a solution for the long term. If this doesn't bring us any community benefits package then we will not have it.

In Copeland we don't have a cinema, we have high youth unemployment and areas of multiple deprivation.

You are implying that if that store went on site then we would get some social benefits.

The Sellafield Workers Campaign said we want the GDF.

With the new GDF consultation, communities will get £1 million per year just for saying they are interested. I expect other communities beyond Copeland will then express an interest.

Road transport security: despite what you say, there is still concern around transportation. What you don't want to do is transport them from one end of the country to the other and then have to transport them back again for the GDF. *(As GDF site is not known this cannot be considered in the assessment.)*

On the security, are you planning to inform communities along the route? What will the arrangements be? *(Yes. There will be a security and safety escort.)*

What are the planning timescales for this? *(About two years for design and planning.)*

When you down-select will you have a contingency in case planning fails?

Who is the final planning authority in this area? *(Cumbria.)*

What would be the situation if they fail to get planning? Why would Sellafield appeal as there is no commercial incentive for them to do so?

The presentation and the literature have been very, very good.

We just wish DECC would do this for the GDF with the same passion.

## **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Cleator Moor Civic Hall and Masonic Centre**

**17 December 2014, 6.00pm**

**MOD representatives present:** Linda Eadie, Mark Ball, Lucy Samuels

**Members of the public present:** 3

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

How much does it cost at present to keep the subs afloat? (*Approx £5-10million a year.*)

Why get the subs in separately and not when you are doing maintenance? (*We will be aligning with the maintenance schedule where possible.*)

Can't you recycle the ILW waste? (*No.*)

Is the transport vessel going to be under pressure or under vacuum? (*Neither, ambient.*)

Will it be dry? How dry, what level?

Why have you opted for road transport instead of rail?

The road transport is a higher risk though, in terms of accidents.

Will it have to be licensed for transport? Will it be escorted? Will you transport it or will it be contracted out?

You are keeping it in one piece but if it is to go to the GDF eventually, then wouldn't you be better doing some size reduction and do some decommissioning in the process?

This needs to be considered alongside the consultation on the GDF, as you will have to look at the specifics of the cave within the GDF.

Did you say it would not need to be monitored? (*There will be some monitoring.*)

Would the store take in post Fukushima recommendations, in terms of earthquake protection? (*Seismic qualification is being considered.*)

My view is to build it at Sellafield.

You already have existing storage facilities at Sellafield.

You said 0.2% of total inventory, what is that of? *(0.2% of ILW by weight.)* And what proportion of the high level waste? *(We don't have any high level waste in terms of this project.)*

Will Radon levels be taken in to account for the sites, in terms of the increased impact with this?

Do you think the Scottish site is a greater risk because of the political situation?

You are planning for a 2016 decision on the site, but we may have a change of Government by then, so how does this affect it?

Are we going to be the first country to do this, or has it been done elsewhere? Have you been to see what other countries are doing? Are we behind other countries and on the back foot?

How are you dealing with the physical deterioration of the submarines?

Is the decommissioning process subject to ONR approval? *(ONR and DNSR are involved throughout the process.)*

Have the issues been resolved around the structures to take the RPVs out?

Do people still work on the submarines?

If this all happens, will you then do other countries and bring theirs in too?

After these 27 RPVs, what happens to the ones after that?

Once you start decommissioning, will you close Rosyth and Devonport as nuclear sites?

Could you just tow the Rosyth subs down to Devonport to clear the site?

**Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **The Beacon, Whitehaven**

**18 December 2014, 1.00pm**

**MOD representatives present:** John Davis, Mark Ball, David Collier

**Members of the public present:** 8

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Is the Chapelcross option likely to be approved by SEPA? I've worked at Dounreay recently and there seems to be general opposition to the movement of ILW across the border. *(SEPA is a key stakeholder in the process.)*

What does it mean by 'there will be no measurable increase in radiation levels around the site selected'?

What does 'synergies' mean in terms of the sites? *(The possibility of crossover benefits from other site plans, e.g. plans at Aldermaston.)*

Are you replacing the RPV lid for shielding? Is it the operational lid? Is the RPV lid activated? *(Yes, but to LLW levels.)*

Are you keeping the core barrel inside the RPV? *(Yes.)* During storage will the core barrel still be inside? *(Yes.)*

Presumably you will have gone through a decontamination process beforehand, to remove 'crud'? *(Some decontamination, but crud will be left inside, though this is a small amount.)*

Is it proposed to use the RPV to store other ILW waste, such as the primary loop?

You said about cost, if you let it go to a commercial site will it come down to who is the cheapest? Is there then any chance that a third party could end up running it? *(An NDA representative commented: the responsibility for safety will always be retained by the site licensee.)*

If it is Sellafield, will they still be responsible for it? *(Yes.)*

Has Barrow-in-Furness been considered as a site for dismantling the whole submarine? It seems a very convenient option for this.

Could Hartlepool come into this as they have a breaker's yard there?

For the final vessel, after RPV removal, wouldn't it be easier to dismantle them at Devonport and Rosyth rather than move them elsewhere?

RPV transport by road must be a difficult job compared to by sea?

They recently constructed a special roadway at Sellafield from the dock, which would help, wouldn't it?

Could you revisit the dismantling/size reduction of the RPV prior to storage, as technology has moved on in the last two years and will move on further and this could be easier now? *(This decision to store the whole RPV was taken a year ago.)*

If you are going to dismantle so many, wouldn't it be cost effective to develop the infrastructure needed for sea transport?

Do you see a size reduction facility as being on the same site as the interim storage? Moving about between sites seems to be an issue so wouldn't it be better to have them on the same site?

The Sizewell B RPV will need storage and that is huge. *(That will need to be cut up.)*

Are the steam generators likely to arrive at Drigg? *(No, we are looking at smelting them and then taking the remainder LLW to the Low-Level Waste Repository near Drigg.)*  
The WAGR steam generator was taken to Drigg.

Who is writing the safety case? I am a safety case author.

Is it likely to be Babcock that does the dismantling? *(Yes, as they own the two sites.)*

In future can you explain the various acronyms, as many of us don't understand these?

I think you should have something in the presentation about radiation levels. People want a comparative risk statement so the public can understand it.

## **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **The Beacon, Whitehaven**

**18 December 2014, 3.00pm**

**MOD representatives present:** Linda Eadie, Nick Brown

**Members of the public present:** 4

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Have you been to any of the other sites yet?

A visual simulation of this would be easier to understand rather than all this information.

Is the store above ground? When you take the RPV out will it be kept in above-ground storage?

You're not after our views on the underground storage today then? *(No, though we recognise the interest in and relevance of this.)*

This is pretty insignificant really, isn't it?

What is the Intermediate Level Waste, is it liquid?

Where is the fuel, is it in the RPV? *(No, it has been removed.)*

You say about taking the fuel rods out, so where are they now? Have they been sent to Sellafield? *(Yes.)*

If we are accepting high-level waste now, why are we talking about this lower level waste?

I think it would be good to have it at Sellafield, as it is logical given that we have the higher level wastes there now.

You presented that it would be virtually impossible to have an accident: can you explain this?

I think this boils down to economics. You are going to choose the cheapest site, aren't you?

Why not do the decontamination now before storing it, given that the decontamination facilities are there now?

I thought you could decontaminate it and then reuse it? (*No, you cannot decontaminate activated steel.*)

Capenhurst, Aldermaston and Burghfield are all inland. Why don't you bring it in by sea as we have all the facilities here already? There are facilities at Workington and they used to bring in the flasks from Workington by road.

With only one transport per year it would cost a great deal to use sea transport and maintain the infrastructure for 12 months between each transportation activity.

You say about having to do design work. Is this the first time anyone has done this? Has anyone else transported these before?

Has anyone assessed the routes for the sites to do the transportation?

I didn't know there was anything like 27 submarines to be decommissioned. This is all self-explanatory, so why are we here today, what do you want from us? Is it just acceptance you want?

This can all be done at Sellafield already. When there is all this apathy about it, without many people coming along, is it worth doing this consultation?

The main people who protest about these things don't live in the area and they don't depend on the jobs.

The only negative thing you can find about Sellafield is the transport, but as far as I'm concerned I have no concerns about this and storing it here.

I have lived in Whitehaven all my life and watched it going downhill, with the loss of mining, etc. We have been very dependent on Sellafield for work. I have no problem with this so if it creates another 10-20 jobs then I would welcome it.

The MOD are just waking up about how to consult with the public, as in the past it was just about telling us what would be done, so thank you. The information is all quite detailed.

I would just refer to it as nasty material, just like chemicals and other things. I was at Sellafield for 40 years and have been to Aldermaston, Burghfield and Capenhurst and my biased view is that Sellafield would be best for this

There is a lot of expertise in the area with design and manufacture so what extra benefits can you bring to the area? There is the design/manufacture of the transport containers and there is experience of this around the area. Can you think about the wider community benefit in this sense, in terms of the added value it could provide?

There are also young people in this area capable of being trained. There is a lot of construction work going on at Sellafield and there is a new construction college being formed to try to train young people in the area. There is a great skills shortage, so anything you can add to this would be beneficial.

We used to electro-deplete it, is that feasible for this? *(No, this is radioactive throughout the material not just on the surface.)*

**Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **The Beacon, Whitehaven**

**18 December 2014, 6.00pm**

**MOD representatives present:** John Davis, Mark Ball, David Collier, Becky Winston

**Members of the public present:** 6

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Who would have responsibility for the repackaging and size reduction later? Would that be the MOD? *(MOD retains ownership of the waste and so is responsible.)*

So the product in its current form is not compatible with the GDF then? *(There is the possibility of whole disposal avoiding size reduction.)*

So is size reduction factored in to the whole life cost? *(Size reduction is not considered within the site selection, but it is taken into account in the whole project cost.)*

Are they definitely going to the GDF? Or is it likely that you will wait it out until it is Low Level Waste and could go to the Low Level Waste Repository near Drigg? *(It will go to the GDF.)*

Is that the case in 100 years time? *(Yes, it will still be ILW.)*

You mentioned some of the synergies that are possible. I think there is probably the opportunity for a lot more synergies. Is there a consultation on the future synergies or future opportunities regarding MOD activities?

What is the NDA's position on Sellafield being a site and would you accept any detriment to the Sellafield mission? *(An NDA representative commented: We reviewed all sites and selected only two suitable sites for this, one of which was Sellafield, so it is possible pending further investigations.)*

Would it be within the existing site fence? *(An NDA representative commented: It would have to be in the existing site fence and with no detriment to the mission.)*

Is there any timing for the first shipment of an RPV to the site?

Would there be any investment in the existing road infrastructure?

Have you ruled out transporting these by sea?

As you are storing it at Rosyth and Devonport and several of the sites appear to be near the coast it would seem sea transport would be an obvious option.

Sellafield was installing a 'white cube' several years ago and installed a temporary port. Would that not be more efficient if there was investment in it to make it available for more projects? *(An NDA representative commented: That was a one-off project.)*

There is the potential for new nuclear plants here, so is that being considered within this process? There is the possibility that you could benefit from some of the investments made for that.

How confident are you that you can remove any loose contamination and liquids from the RPVs?

In terms of the timing it is not the best for Sellafield as it is at a very busy time. Is there a possibility that another company could deliver this on the site?

Have you got a bounding cost figure, what sort of cost are you considering? *(Whole life cost is up to around £100 million. Current cost is £5-10 million per year to maintain the submarines afloat.)*

Has the Scottish Government bought in to this? *(We have a good dialogue with the Scottish Government.)*

Anything classed as fuel coming from Dounreay is able to come to Sellafield but waste is not allowed to leave the Dounreay site. Have you had any issues with that for Rosyth?

Regarding the GDF process, if Sellafield is awarded this store would that perhaps enable this area to be put back into the options for the GDF site? Would it increase the chances of the GDF coming here?

## **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

**Victoria Halls, Annan**

**16 January 2015, 1.00pm**

**MOD representatives present:** John Davis, David Collier, Christine Bruce, Linda Eadie

**Members of the public present: 6**

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Is the presentation available to have after?

A lot of the consultation has been good, the technical aspects, history, etc. We previously raised the issue that the only reason we would support this is the socio-economic benefits from the scheme, such as a community fund, improvements to the roads, etc. You have not addressed this. You have not answered these questions, so I think you will get a lot of opposition to it. *(In the planning process we will look at any impacts and therefore any improvements that need to be included.)*

So basically there will be no community fund? *(That's right.)*

What would NDA get paid for this? *(An NDA representative commented: The contract will be with NDA and we will appoint local management.)*

Chapelcross will be going in to care and maintenance long before this happens and towards its end state. So how will this affect the process of going into care and maintenance?

You said this is low impact. I think this will be a big impact. There have been previous escapes from sites. I don't want any nuclear waste here. Low impact is impossible. The transportation is a concern too.

Are you saying it is indestructible? I'm concerned that something could escape. *(Storage and transportation explained.)*

The community would be happier if there were some economic benefit for the local community, like with a wind farm fund. Will the NDA set up a community fund for this, to give some benefit to the local community? *(An NDA representative commented: There wouldn't be any extra fund set up, other than our usual channels.)*

When you were originally considering Chapelcross you mentioned policy constraints would be taken in to account, so I'm quite surprised that you consider Chapelcross as a

possible site given the Scottish policy position. I am aware that MOD waste is outside of the Scottish policy, but this still has an influence for site consideration.

Who pays for the movements of the containers once they are on the site and if there is any repackaging that is needed on the site? *(MOD would.)*

With the assessment process, will the costs for each of the sites be made public before the decision is made? Surely this is a big factor in the consideration and so should be made public. *(This information would not be released, as it is commercially confidential.)*

The public should be aware of all costs, as it is public money. I think you are completely wrong to withhold this information until after a decision is made.

It is taxpayers' money so I think the public are entitled to know all the costs. *(The MOD takes value for money very seriously. Our independent assurance will make sure of this.)*

This is not a competitive process, as you are not asking the sites to bid against each other. Isn't the whole point of the public consultation to be transparent so that everyone knows what is going on?

With regards to the assessment process, you will be assessing it on the various criteria you have mentioned. Will you make available the assessment weighting criteria, such as financial, public opposition, etc?

What weight do you give to public opposition to a site?

I can't see that you would get anything less than opposition, as there is no reason for us to support it as there is no local benefit from it. I can't see why any area would support it, so it is just about the operator making money out of this.

So how many jobs would there be, as the presentation said very little benefit? *(As this is an NDA site there could be different possibilities for this site.)*

The document says a neutral impact on the local economy, which doesn't sound great. Is there more information available on this?

What negative impacts have you identified on the local economy? *(Construction impact.)*

We are trying to redevelop the whole Chapelcross site, so this could have a negative impact by deterring this redevelopment. There is a report being done on the options for development in this area. It is an important site for development locally.

Members of the public have asked why isn't this store being built at Rosyth or Devonport?

Aren't Rosyth or Devonport owned by the MOD? *(No.)*

I wouldn't support this, even if there were one or two jobs. You are asking this community to accept waste from elsewhere and that would make this site a dumping ground for waste. I don't see why any site would accept this.

This is waste not generated by the NDA, so this should be stored on an MOD site as it is MOD waste.

You haven't progressed your plans enough for it to be any benefit to this community. I believe it is costing £1 million per sub to store them so that is £19 million, so this would be saved. Surely some of the money saved could be put in to the local community?

The council has been listening to people and there does not seem to be much appetite for this here. There is an appetite for a new nuclear power station, but not for this. So can you give me your best pitch for why we should have this? *(What benefit do you expect or want?)*

We want increasing jobs, improved infrastructure and community benefit, such as investment in to the local area.

I think this is a massive impact on the area. Chapelcross is one of the largest private employers in the area. *(Are you talking about benefits over and above the planning gain?)* Yes.

There have been benefits to the area from Chapelcross. There could be benefits to be had from this, but I would have to be sold this. The site opposite Chapelcross is a key location for enterprise development for this area, so this could deter that and it would be a real detriment to the area. *(There is already going to be ILW at Chapelcross. Is it just the fact that this is additional? If we could demonstrate how small this is in comparison would that help?)*

If I was going to relocate my business, there is a perception about this that will deter businesses.

It has already been called a dump. The fact is we are trying to develop the site for other purposes, and this store will label the site as a nuclear dump. *(An NDA representative commented: There is an acceptance about the store that is already planned there, as it was generated on the site.)*

But having another store sets a precedent and there may then be fears of further stores.

At a place like Chapelcross, where nuclear isn't their future, then adding to the waste is not helpful.

I think people understand that it is an interim store, but it is being seen as a dump and the press will keep referring to it as a dump and you won't get away from that.

There are all different aspects to community benefit. What do you see as the actual community benefit? The planning gain would be almost nothing.

There is a high risk to the local community so there should be some benefit.

I still can't see why the dockyards aren't storing them. Does the MOD have any CPO (Compulsory Purchase Order) rights to force Devonport or Rosyth to take them?

I don't think what is going in there is a major issue among the public. *(An NDA representative commented: There was another benefit perceived before that if we are seen to keep ourselves in with the nuclear industry then this could help the chances of more in future.)*

As far as the SSG is concerned, we decided that we would be open-minded about the project and listen to what is being said and what the public says. But from what is being presented I have no confidence that as a region we would be willing to accept this. You have not persuaded us.

I think the consultation process has been excellent and I am happy with the proposals and that there is no risk, but the fact is that being classed as a waste dump and without local benefits means that I don't want it here.

Wind developers have to do this, giving to a community fund.

If there were a new nuclear build or another ILW store developed then there would be local contributions from them.

Chapelcross has a tritium plant up there from a long time ago. There was a lot done with nuclear warheads at the site. People in the area didn't know what was done at Chapelcross. There have been problems and there could have been catastrophic incidents at the site.

## **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

**Victoria Halls, Annan**

**16 January 2015, 3.00pm**

**MOD representatives present:** John Davis, David Collier, Christine Bruce, Stuart Patten

**Members of the public present:** 6

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

On the percentage of the national inventory that this represents, what was that? (0.2%)  
As this seems so small, can't the ILW store capacity that already exists be used to store this?

Are you able to put a number on the jobs created or sustained? (*Not really, probably just a few, 2 or 3, jobs sustained.*)

On the decision-making process, who takes the decision in 2016? (*It will go to the MOD Investment Appraisals Board with a recommendation to the Minister, and ultimately will be a ministerial decision.*)

Will the recommendation made be for a single site? (*Yes.*)

What will happen for future submarines and ships, will they go here too?

What is the half-life of this radioactive material as it is important to know?

You will be storing all this material together and this will make it extremely hot. Would you not consider moving it to several smaller locations? I'm pleased with what you are trying to achieve, but I'm not supportive of having any nuclear material. There has to come a point when we stop making more radioactive material.

For Chapelcross, what will happen to the reactors up there?

About three years ago the Chapelcross management team went to visit a local school to ask children about what they would like to replace the site, and they said a theme park. This was not right, as the children didn't understand issues around radioactivity. What you are doing is commendable, as there have been a lot of problems and issues with what has been done in the past. You might say it is safe, but I don't think it is safe at all.

In the criteria, are you taking into account the quality of the workforce, as Chapelcross probably has the best workforce in the country? (*An NDA representative commented:*

*There is a good relationship with the site stakeholder group and what we hear about the workforce is good.)*

You keep a lot of the paperwork and information at Chapelcross, will that continue to be the case?

Will you be bringing back security to look after the radioactive material?

What would happen if someone hit the store with a missile?

The process is for the interim storage and then a possible size reduction facility, is that right?

You talked about the size of the store needed for the RPVs. Is there a likelihood that it will be built bigger than needed to store other radioactive waste?

Are there any other Government nuclear waste programmes that have a similar requirement?

If this site is chosen there could be other demands for storage here, and this could set a precedent for storage at Chapelcross.

Who gives permission for this in Scotland: would it be the Scottish Government?

You will obviously rank these sites into your preferred site list, so if in the worst case scenario the local authority didn't give permission would you then go down to the next one on the list?

Will other potential uses of nearby sites be taken in to account as well? *(Yes, you would take into account if there were plans for other neighbouring sites.)*

So would the fact that we are looking at a masterplan for the wider area around Chapelcross be taken into account?

Are you looking at all MOD sites, or just these five sites? *(Site selection explained.)*

Would you think about bringing it in by barge rather than by road?

What are the timescales? When would you expect the store to be in place? *(Around 2022.)*

It would take until 2022 if a store has to be built, but you could find there is already a store available to use.

After the site decision is made but before planning is obtained, is there anything that would be precluded from development nearby?

I'm assuming that there would not be an exclusion zone around the site? *(No.)*

When would the GDF be ready for this?

Could you just leave the submarines where they are? What is the cost of doing all of this compared to storing them at the dockyards?

Sometimes by leaving them stored as they are may concentrate minds further up, to stop producing more radioactive waste. Though I agree that we should be taking responsibility for what we have produced and dealing with it.

Despite not wanting to have radioactive waste here, I would still say that Chapelcross is one of the safest sites to take this.

### **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

**Victoria Halls, Annan**

**16 January 2015, 6.00pm**

**MOD representatives present:** Linda Eadie, Mark Ball

**Members of the public present:** 3

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

What is the size of these RPVs?

Will the GDF be in this country? *(It will be in England or Wales.)*

Has the RPV become contaminated then? *(Not contaminated but activated.)*

Will the Intermediate Level Waste escape when you take the RPV head off? *(No.)*

How will the RPV be handled? Will this handling be done remotely or by workers? *(By workers. It doesn't need to be done remotely, due to the level of radioactivity.)*

Would it become dangerous if there was intense heat, for instance if there was an explosion?

What has happened to the fissile material, the fuel? *(It is stored at Sellafield.)* The fissile material is obviously a much bigger issue.

Would it be policed like Chapelcross was when it was operational? There was a high level of policing in the area at that time. *(The risk will be assessed and the security set at the appropriate level.)*

What would the security be like and who would do it? *(The probable level of security explained.)*

So the employment benefits would be minimal then? *(Yes.)*

Would the roads be upgraded for this?

Would there be any road upgrades needed at the Devonport or Rosyth ends of the routes?

Looking strategically, you could be storing this in a foreign country by 2040, as Scotland could be separate from the UK by then.

Is there a possibility of it being stored on two sites instead of one, for instance Chapelcross for Rosyth submarines and a site near Devonport? *(The cost of building two stores would be much greater, so it makes sense to have just one store.)*

Can you explain the term 'activated' rather than 'contaminated'?

What happens when the RPV radioactivity starts to decay?

Have the UK authorities set the legally acceptable levels of radioactivity?

Would you be doing regular checks and how far away from the site would these be? My father had a dairy farm, in the 1960s, and we would have to provide samples of milk to Chapelcross for monitoring.

Is there any material at Chapelcross currently that is contaminated or activated? *(An NDA representative commented: Yes and that is being managed and will be stored on the site.)*

Where does the energy from the radioactive decay go?

What is the level of radioactivity you get from an X-ray in comparison?

There is a higher prevalence in this area of childhood leukaemia, which can come from exposure to Low Level radioactive Waste. So can you explain the situation with this? *(An NDA representative commented: I'm not aware of any leukaemia clusters in this area.)*

We are concerned about the potential health impacts for our children and grandchildren.

Public confidence seems to be low on your list for assessment of the sites, so I'm concerned about what level of monitoring would be undertaken to ensure the public can be confident in it. This needs to be explained. *(An NDA representative commented: The monitoring should be the same as it is now for the site.)*

I'm not aware of what monitoring is done now so we need to be told about this. *(The SEPA monitoring and the RIFE report of results was discussed.)*

Would the discharge pipe continue to be in operation at Chapelcross? *(An NDA representative commented: I wouldn't imagine there would be any discharge once the site is in the care and maintenance phase. Do you think Chapelcross is a suitable place to put a store?)*

Is it only because it is being decommissioned that it is on the shortlist?

I don't know if it is suitable, we just don't want it here. We have had our fair share of this, so it is someone else's turn to have it.

I'm against it from my children and grandchildren's point of view. Surely it should be on an MOD site, as wouldn't you have to buy part of the other sites for this store?

If you put this store at Chapelcross doesn't that set a precedent for other things in the future to be put here? This seems OK but it is the precedent that it sets for Chapelcross that is our concern.

Why wasn't this planned for when the submarines were built? It is just like with the nuclear power stations, where the decommissioning wasn't planned for.

I think you have already made the decision to put it here, because there is a low population in this area compared to the other sites. It would seem that there would be more opposition at the other sites.

There seems to be a lot of apathy in the area about this.

There are obviously pros and cons from the site and there has been a lot of employment from Chapelcross, but there does not seem to be any benefit from this proposal.

We don't seem to be getting anything out of this, so for the minimal risk it is not worth having it.

### **Post-it Note comments**

.

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Macdonald Craxton Wood Hotel**

**20 January 2015, 1.00pm**

**MOD representatives present:** John Davis, David Collier, Christine Bruce

**Members of the public present:** 8

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Do you have any details on the size of the low loaders that will be transporting the RPVs to the site?

Considering the route shown on the plans, it goes through Capenhurst village. There are some 90-degree bends on this road and a pinfold structure, which is a monument that would be at risk of being hit.

I live in a cottage alongside the road and there are no foundations to them and they date back to the 1860s, so will these vehicles have any impact on the road and houses? *(A CNS representative commented: We think the vehicles will go around the corners through the village.)*

What happens to the nuclear fuel that comes out of the reactor? Will it go back inside the container? *(No, it goes to Sellafield.)*

Can you tell me how much monitoring is Low Level monitoring? Is it just a Geiger counter left there? *(It will have multiple monitors and we will have an expert workforce checking the store.)*

These are going to be trundling around the country over the next 20 years. How much dismantling will there be at the storage site? Will they also have to be moved to another site for the size reduction?

Why can't it go to where the GDF will be, which is likely to be Cumbria, nearer to where it will be disposed of? And therefore not in our backyard.

It worries me that there are a lot of unknowns with this and there are a lot of different weightings for the various factors, which could be manipulated.

After 2040 they could still be here for another 50 years, so it is future generations I am concerned for.

The location of the GDF is part of the selection process. *(The GDF is a completely separate programme looking nationally for a site.)*

I'm concerned that they may want to start shredding things on this site. *(A CNS representative commented: We already look after tens of thousands of tonnes of this sort of material on the site and have struck Government deals for storing such material for a hundred years. We have also cut and size reduced thousands of tonnes of activated materials on the site.)*

On the radioactivity, this is for one reactor so if you are bringing all these RPVs together you are multiplying the radioactivity, so with 27 RPVs you would have 27 times the radioactivity wouldn't you? *(Yes. Radioactivity and half-life explained.)*

In the documentation there is a comment about dosage being 1 milliSievert and a comparison to X-rays that doesn't seem to be correct, it appears to be a factor of 10 out.

With the monitoring, Ellesmere Port has a public monitor so we can see emission information, so are we also going to have something public that shows us the radiation level?

It sounds as though there is far more danger with what Capenhurst is dealing with now and not with this additional material. So why are we having this conversation now for this material, why are we being consulted now? We weren't asked for our opinions before. *(The decision to be open and transparent about this was taken some time ago and it will give us more information about the sites.)*

In terms of the public consultation, hopefully you are taking into account the public concerns raised, but are you also taking into account the amount of housing in the area as there are new houses planned in this area near to the site?

The people not here are going to have a perception about this, so I am concerned about being able to sell my house and the impact this will have.

Is there a risk of more and more coming in here? Is it going to become the dustbin of the world with waste coming in from around Europe? *(A CNS representative commented: We will look at any opportunities on its own merits.)*

There is a conflict as CNS are looking to bring in more and provide jobs, but the people who live here are concerned about the impact on house prices, the environment, our children, etc. *(A CNS representative commented: This presents no incremental hazards, so I wouldn't expect it to have any impact on house prices.)*

For all the sites the price of the shed will be more or less the same. As you are already building stores on the site this looks suspicious and looks like you are already intending to do this.

I think you have a serious PR problem at CNS as you seem to be taking a lot and giving a little. How widespread is the information that was sent out about this? How widely known is this? *(Consultation details explained. A CNS representative commented: I have given a briefing to the local paper, so they have run a story about this.)*

I will be calling the Pioneer newspaper tomorrow to see if they are going to be running a story on this. *(A CNS representative commented: We have briefed all the local newspapers.)*

Are CNS running the site just with contractors? *(A CNS representative commented: No, they are our employees.)*

Why was planning permission for 700 car parking spaces at Capenhurst asked for? *(This is not known.)*

What state are the facilities like at the other sites? Have they all got a plot ready for this store?

You have to go through the selection process, which looks really complex, so it may just come down to who shouts loudest. It seems Sellafield would be the best site as they do a lot of this already.

I'm wondering what impact the handful of us here would have on the selection process?

I would put maybe 50% weighting on what the public thinks of it. I think this should be high in the selection criteria.

So do the sites tender for this? It's not going to just be the cheapest, is it?

Is it going out to a contract then? *(Yes. All the sites have a site operator who would be under contract to deliver this.)*

So these stores haven't been built yet. It's going to be a bit of a rush to put these up, isn't it? *(We have a realistic programme looking to have the store ready for 2022/23.)*

Will this store be above or below ground? *(Above ground.)*

Aren't there political implications with putting it in Scotland, given the recent independence campaign? If there was another referendum and they decided to split off then the MOD would be stuck, wouldn't they?

I'm concerned about the transportation of these. Would they have a police escort to make sure that it doesn't have an accident?

Would it be transported in the middle of the night? *(It would be carefully scheduled to minimise disruption.)*

My conclusion would be that nobody would want this in their back yard, we are all Nimbys, so you should consider the population around the site and I think that would stop it coming to Capenhurst. The population around here already suffers from the environmental impact from things like dioxins from the incinerator down the road, so it is the cumulative impact that should be considered.

I don't want it and I don't think most people in the town would want it.

There is no radioactivity outside of the shed and certainly not outside of the site, so what possible impact could there be? I don't think there is any problem with having this store.

It is just 27 lumps of metal in a big tin shed with no impact outside of the building, so what is the problem?

Will the public have full access to the selection criteria so we can see how it is decided?

Is anyone taking notes of what we are saying? (Yes.)

The Capenhurst Pinfold is part of our heritage we are trying to protect.

Is it set in stone that only one site will be selected? (*This is our intention.*)

Are there any other options for dealing with this stuff, such as melting it down, instead of just storing it?

If it has a half-life of five years and falls off so quickly, won't it be quite safe by the end of the 20 plus years of storage? Why would it need to then go underground after this time?

### **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Burghfield Community Sports Association**

**22 January 2015, 3.00pm**

**MOD representatives present:** John Davis, David Collier

**Members of the public present:** 6

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

With the radioactivity being on the inside of the RPV, is the idea that this will keep all the radiation away from the people at the site? *(They will also be in a container.)*

So are they about 10 feet wide, or larger in a container? Will they be classed as a normal size load for transport? *(They will be classed as an oversized load.)*

How high will the store be? Did you say 20m? *(Yes, possibly about 20m.)*

You said it doesn't have any fissile material, so where is that going? *(Sellafield.)*

I'm disappointed as I thought that the reason this site was shortlisted was for an ultra safe underground storage, but this clearly is not the case.

So there is really no real risk from a terrorist point of view, unless they just wanted to make a point.

My main concern was about flooding, but much of that has been answered. I live nearby and was recently flooded. My concern was that contamination could end up going in to the river, but having seen what will be stored that does not seem to be a risk.

My concerns have been alleviated based on seeing exactly what is being stored.

Thirty years ago the then district medical officer identified a leukaemia cluster in this area. Can you comment on this? *(There has been a great deal of further research into this.)*

There was a good deal of statistical fiddling going on with that research back then and it didn't really hold up. Some of the additional cases were for people who had moved into the area with the condition, so couldn't be linked to the site. *(There would be no increase in the radioactivity in the area from this.)*

I'm chair of the Nuclear Awareness Group in Reading, set up in about 1991. My daughter contracted leukaemia. There was considerable concern back then about this. We are a non-political group. The report at the time recommended greater openness from Aldermaston, but there is a lack of openness locally. We are not on the Local Liaison Committee. We considered your submission at a meeting recently and we will be opposing it because why should we have more? This is a built-up area. The decision making about putting the Aldermaston and Burghfield sites here in the first place was flawed, so any decision to expand their activities would also be flawed. Also, if AWE hasn't got their act in order now then how can they do more until they have got themselves sorted out? There has been a failure by the sites to meet deadlines. *(The ONR has issued a licensed instrument for Aldermaston.)*

When will Aldermaston be compliant with the regulators' requirements?

Are you likely to get agreement from the SNP in Scotland for Chapelcross? That could reduce you down to four possible sites.

Would you be building a slip road from the M4 through the countryside to the site for this? *(No. The proposed route was explained, from M4 J12.)*

So there is no major disruption expected then? *(No.)*

As long as you don't come in through Grazeley Green. Would you bring them in through the main gate?

Why haven't you had a meeting in Reading? It is only five miles away and is a major conurbation. It would be an obvious place to have a meeting. *(Consultation process explained.)*

It feels like you are ticking the boxes for consultation, but you are not consulting large numbers. You are bringing more activity to a site that is already struggling. *(We would really like people to attend and get involved.)*

Can you email us the presentation?

### **Post-it Note comments**

How will the SNP/Scottish Parliament react to/allow use of Chapelcross?

Not underground?

No terrorist value or threat.

Flooding concern.

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Tadley Community Centre**

**23 January 2015, 11.30am**

**MOD representatives present:** John Davis, Mark Ball, David Collier

**Members of the public present:** 9

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

On these RPVs, you say there are 19 submarines, so is it 1 RPV per submarine? *(Yes, so a total of 27 RPVs including from the submarines still in service.)*

Will the total project take about 20 years to get the store filled then?

Where is the GDF likely to be?

Where is existing ILW stored?

Will the consultation report in 2015 be available to the general public?

It is all very well to say how safe and secure it is now, but should we be looking ahead 40 years to when you will be cutting them up and the impact that will have? *(There is no assumption that size reduction would take place at the same site.)*

Is there any forward thinking about the location of a size reduction facility?

Have you identified the potential routes into the sites at this stage? This is particularly relevant in this area, especially for Burghfield as there is really only one route into that site.

The Goring Lane route is OK, but many of the other roads are just not practical for Burghfield.

Escorting large loads into Burghfield is a real problem, though I appreciate that there won't be that many of them.

I worked at Windscale and Aldermaston. Communication is a big problem at Windscale/Sellafield, as Cumbria is a difficult area to get to.

What about if a hostile person had an intent to spread radioactive material?

Is it really most vulnerable when it is being transported?

If an aeroplane fell out of the sky or there was a terrorist attack, when you have 27 together in the store that area would become dangerous and there would be a danger to the public wouldn't there? If people touched pieces that had broken away from an RPV from such an incident it would be dangerous.

You are restricted to areas on the sites that have room and are available to use, so have you identified sites at Aldermaston and Burghfield that would be used for this? *(An AWE representative commented: Yes, we have space on the sites and there is a plan for developments across the sites.)*

AWE doesn't have a good reputation for delivering schemes on time and on budget. What is the lead-time to get such a building up and running? *(An AWE representative commented: This is a relatively simple store to build, compared to other projects on the sites. It would take of the order of months to a year or two to build this, not years to decades.)*

I would not be happy if millions of pounds were being overspent again.

You need to look deeply into the current operations and performance at the sites.

Where else in the world had this been done and have you looked at those? *(Russian, US and French strategies discussed.)*

So other countries have all looked at very isolated sites for their stores, on land. They must have a fear of accidents and are keeping them away from people for this reason. It seems that they have all considered the isolation of the site as important and presumably this is in case there is an accident isn't it?

The French aren't likely to want to come and use our facilities are they? Is it just for 27 of our own submarines?

Why not accept more radioactive waste from elsewhere?

Is there a time factor when all this becomes safe? *(Radioactive decay discussed.)*

You have been looking at the downside, but what about the upside of this? What are the benefits of having this store, should we be welcoming this?

So there is no major benefit from it, unless we can make it a tourist attraction!

It is necessary; it has got to be done.

**Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Tadley Community Centre**

**23 January 2015, 1.30pm**

**MOD representatives present:** Linda Eadie, Mark Ball, David Collier

**Members of the public present:** 5

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

You say 2040 for when you could be in a position to dispose of it in the GDF. By that stage wouldn't it be in a state when it could be reused and so why would you want to dispose of it in the ground? (*Radioactive decay explained.*)

So under current regulations it will still have to be stored somewhere? (Yes.)

For underground disposal, is that storing it in caves or just buried?

What size would this facility be? Is the store itself really just to stop people getting in and to keep it safe? (*Layers of security set out.*)

The GDF store is where you are hoping to send all this ILW waste but it is not going to happen in 2040 is it, given all the other ILW waste? How much of this ILW do we have and so when is it actually going to happen? (*Planning timescales explained. An AWE representative commented: Planning for 2070 for ILW waste going to disposal facility.*)

So it means that we could have this store for a very long time?

Is there any progress on the GDF? (*Current status set out.*)

I don't want it here, because we are thickly populated in the south of England and particularly in this area, so if there were an accident at the store or with the transport it would have more of an impact. Sea transport to other sites would be safer.

I noticed that the roads may have to be changed to facilitate this and it mentioned vibration. How would we know whether this had had an impact on our homes? (*The vibration mentioned is from construction and this is a planning issue.*)

How would you get in to the site, as the only road of any size is the A340? No other roads would be suitable. (*Proposed routes set out.*)

We were thinking about whether the Hampshire part of the A340 was OK.

If choosing Aldermaston, in the last few years there have been a couple of safety issues at the site. Are these going to continue? Are these safety issues going to be a barrier to taking on things like this store? Everyone was taken by surprise by these incidents and they should have been dealt with before.

My impression is that storing these RPVs is less of a hazard than an awful lot of the waste that is generated through Aldermaston's normal activities, so these are not a particular concern. Which Minister in Parliament is responsible for our safety on this? *(Regulators and Government departments discussed.)*

This particular proposal, from the technical details, doesn't seem to be much of a problem at all.

I don't want to see any further safety issues at this site.

Are all the regulators on board for the various sites that are being considered?

All the parishes and town councils have formed a Local Liaison Committee, so I'd suggest that anyone with concerns goes to their local representatives on this committee. We are fortunate to have this and you can ask them any questions you may have. *(MOD have presented to the AWE Local Liaison Committee a couple of times on this project.)*

What is the half-life of the gamma radiation? *(Radioactive decay discussed.)*

Has a decision been made as to where the GDF is going to be? *(No.)*

I don't think we should dump this on the Scots, given the political situation up there. The Government there appears to be anti-nuclear and anti-radiation, and we have to be careful about this. I don't think I would trust them with this.

If it were to go into Aldermaston, would it affect the house prices around here? Will people see this and not want to move here?

The AWE areas are definitely more populated than the other areas being considered, so it would be silly to put this here.

I think the populated area is not as important. If we had a serious nuclear accident anywhere in the UK it would affect a huge part of the country, so my main concern is to make sure this is done correctly and safely. It needs to be looked after responsibly.

What happens about Government cutbacks, could it mean that we end up with a facility that is not as good as it should be?

How much would this cost?

Once all the containers have been shipped off to the disposal facility, will this store be able to be used for something else or would it just have to be left unused as it is contaminated? *(It will not be contaminated. We are costing it to include*

*decommissioning of the building at the end, but if there is another possible use then this could be considered subject to planning.)*

Would the gamma radiation activate the store? *(No.)*

When did the MOD start to decommission anything? *(Various decommissioning activities at different locations discussed.)*

Is it only submarines that have these reactors? *(Yes, in the UK. Other countries use them in surface ships.)*

### **Post-it Note Comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **The Beacon, Whitehaven**

**27 January 2015, 3.00pm**

**MOD representatives present:** John Davis, Mark Ball, David Collier, Mark Sanderson

**Members of the public present:** 6

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

You said overseas disposal was ruled out on security grounds, but as these are American style reactors couldn't you buy in to their disposal scheme? (*There is no cross-border trade in radioactive waste.*)

Didn't we have an exemption on sea dumping of waste for nuclear powered vessels? The Russians were doing this.

In terms of ownership of the waste, is that retained by the MOD? (Yes.) Would you contract out the work to the licensee then?

There is a lot of uncertainty around the GDF, so are you confident for all the five sites that they can provide the level of security, etc required for 100 years?

You are proposing moving them on a road transporter. Sellafield has an established procedure for taking large modules over the beach from landing craft. Is this a possible transport route?

For rail transport, the coastal railway line around here is very difficult to use as it was built by different companies to different loading gauges.

If you need to reduce the size of the packages, where will the size reduction take place?

Do you have a favoured site option? (*All sites have pros and cons.*)

Does local opposition or support come into the decision-making process?

Will there be any activity undertaken on the containers during storage, as I assume there will be no radioactive discharges?

What is the total activity of an RPV, in terms of the Cobalt 60 and other radioactive isotopes? Is the Carbon 14 integral with the metal?

What planning consents are required for this?

Will the planning authority for this be Cumbria County Council? *(No, it will be Copeland Borough Council.)*

Why are you starting with Swiftsure, as she isn't the oldest is she? *(Not the oldest, but she is the most representative.)*

What incentives are envisaged for the local community? We are accepting of the Sellafield site and we know about the community funding provided, so what would you provide? *(The planning application would identify any required contributions to roads, etc. An NDA representative commented: It is not part of the Energy Act.)*

A precedent has been set for community contributions here, due to our reliance on Sellafield.

What speed can these transporters go at?

The transportation shouldn't cause much of a problem at just one transport per year.

### **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **The Beacon, Whitehaven**

**27 January 2015, 6.00pm**

**MOD representatives present:** Christine Bruce, Linda Eadie

**Members of the public present:** 4

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Why have you decided to transport them by road and not by sea to Sellafield?

Has more than one site been ruled out as an option? You could have one for Rosyth subs and one for Devonport.

How long is it going to take to build the store? (*About 12 months.*) Are you going to get contractors in to build the store?

Would the chosen site manage it during the storage time?

Have you identified locations on each of the sites where the store would go?

If and when the GDF is ready, is the container of an appropriate size that it could go straight down the GDF or would it need work to reduce the size? Could the size reduction be at the GDF site?

'Nuclear' is a loaded word and getting the public onside is a key requirement. I heard the radio coverage this morning, talking to someone opposing it saying that it was a terrorist threat. Wherever you choose to pick the site, make sure you get your message across and that it is clear.

Have you tried getting your message out on the radio, or using Facebook or Twitter? (*We have put out press releases and responses. What do you think from what you have seen?*)

It would be interesting to see where they are thinking of putting it on the Sellafield site, as we know how crowded the site is.

Are the other sites the same as Sellafield with lots happening on the sites? (*Each of the other sites discussed.*)

You said you would transport it by road, but the route to Sellafield along the A66 is not a good route. Would you be avoiding peak time traffic?

With the planning permission you would seek for this, is the store just big enough for these 27 RPVs or would there be more space? (*Just big enough for the 27 RPVs.*)

What are you doing to try to shape the decision making on the GDF? (*We are a very small contributor so we are not really influencing it, though we are in contact with the GDF programme.*)

The information you are giving is very good and pitched at the right level. It has been very useful. It contrasts with the GDF where the level they were pitching at did not help their case.

It is good that you have planned this decommissioning in advance.

As a presenter you have pitched this well and come across as very open and approachable.

### **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Cleator Moor Civic Hall and Masonic Centre**

**28 January 2015, 11.00am Councillor Workshop**

**MOD representatives present:** John Davis, Mark Ball, David Collier, Lucy Samuels

**Members of Cumbria County Council present:** 7

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

On the cost, when you look at the map Sellafield will be the farthest from any of the submarine sites, so why are you considering Sellafield at all?

Where will the containers be made? *(No decision has been made on this. Design process explained.)*

Will the contract company building the containers have premises already to do this work?

In the investment appraisal you mentioned the construction costs, but what if a site already has a storage facility available that could accommodate the 27 RPVs?

Potentially there might be a very minimal impact from this whole process, with limited transport impact and if there is a store already built that could be used.

On accessibility, are you thinking that it will be road transport, or could you use rail?

During the recent discussions about the long-term storage of radioactive waste it was said that the stores at Sellafield are bulging at the seams, so is there actually space at Sellafield for this?

What is it costing at the moment and what is this cost for? *(Cost of maintaining submarines set out.)*

The ultimate destination is the GDF so you want to consider movement to that site too.

There will be quite a need for road infrastructure improvements. The road infrastructure in Cumbria is probably the worst in the country, so which route would you plan to use for Sellafield? *(Proposed route set out.)*

What contribution to the local community will there be? I think it is important to understand this.

The transport frames/containers could be an opportunity for enhancing employment in the local community. You ought to consider procuring the containers from the local area to the site as part of the local benefit.

For the construction company building the store there should be something in your procurement rules about providing apprenticeships, etc for local people.

You need to think about whether a new build would be required and what kind of benefit could arise for the local community. The building of the shed is not going to be a very long process.

You could talk to Tesco as they have several large new structures available!

I appreciate you still have five site options and you seem to have looked at all the appropriate aspects. I don't think the roads would need improvement here.

I think there would be room at Sellafield for this and I think you would choose Sellafield, but there will be local politicians who could cause problems and they will want something for the local community. They will cause problems if they don't get it. If you could construct the containers locally that would be a big benefit for local jobs and should be considered.

From a recent development at the Low Level Waste Repository near Drigg we have had substantial local financial contributions of millions of pounds. Though we are accepting of these things we won't just have something dumped on us. We will want some recompense for it, either in local jobs, road improvements or local community contributions.

## **Post-it Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Cleator Moor Civic Hall and Community Centre**

**23 January 2015, 1.00pm**

**MOD representatives present:** Christine Bruce, Linda Eadie

**Members of the public present:** 6

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

Is the ILW to be separated and encapsulated first, or just lying in its container?

Is it fuelled? *(No.)*

Does it have to go by road? Could you send it by ship?

We have just had an Evap D delivered and have a port at Sellafield, so surely ship transport could be an option?

Sea transport is safer. Is cost your main concern with transport?

You should look at what we did for the Evap D transport at Sellafield on the Sellafield website. *(Sea transport and assessment process discussed.)*

You mentioned the environmental or terrorist impacts, so why transport it at all then and not just house it at the current dockyard sites? *(Babcock ownership of Rosyth and Devonport and reasoning for sites not being available set out.)*

I think there is a lot of politics involved in this decision. There is no issue at Rosyth with space. *(With Devonport and Rosyth, though, even if we were able to use the sites it would then involve building two stores.)*

Couldn't all the submarines be taken to just one of the dockyards for one storage facility?

Is the store to cater for all 27 submarine RPVs? *(Yes.)*

Are Rosyth and Devonport nuclear licensed sites? *(Yes.)*

If Rosyth and Devonport are not available, then you are going to have to put this on a nuclear licensed site so it will have to be transported to one of these sites whatever. One of the sites has the Kennet & Avon canal to go over.

Why can't you transport it by ship?

You are already taking fuel in to Sellafield, aren't you? You need to construct a long non-tidal jetty at Sellafield.

Evap D modules were shipped from the Wirral up to Sellafield and a tidal jetty was built for this to be delivered. The middle site was stripped down and they were brought on barges and then transferred to vehicles to be moved to the appropriate location on the site. I can't believe that the MOD don't know about this? *(We are aware of it.)*

These things were all looked at back in the 1980s, with plans to bring large items into Sellafield. At Devonport there is a roll-on, roll-off facility very nearby. With Rosyth you may have a problem, though.

Transport into Sellafield has caused many different problems over the years. You are always going to have handling problems.

Whichever dock you go to in Devonport or Rosyth you will have a crane that could be used, so surely that could be used to put it on to a transporter? In Barrow in Furness they move things around like this.

Have you based the favouring of road on a particular site? *(No, for all five sites road transport is favoured.)*

We know from bitter experience that road transport is difficult.

What about the heat exchangers and other parts, what will happen to them? *(As Low Level Waste these are expected to go for smelting.)*

Is the container for the RPV just to store it in? *(It is designed for transport and storage.)*

This sort of container means that the store itself will be a very simple structure, as the container is doing the work.

You said that the operation of the store would not really create any jobs. If it doesn't, then would you be expecting to use the existing workforce at the site?

At Capenhurst and Chapelcross they do not have the experience of this. At Chapelcross they are plant operators and not decommissioners. At Aldermaston they do not have large scale decommissioning.

The people who have experience of dealing with ILW and storing it are in the area around Sellafield, so you should play to your strengths and come here. Sellafield receives materials on a daily basis so is used to this. The experience of constructing the necessary works is also at Sellafield.

I'm highly supportive of the Sellafield site, for the safe and secure storage of these RPVs. I don't think the other sites are used to doing this. It is our day-to-day work.

For the GDF, wouldn't you have to later move it to the GDF store? I know we have issues here in Cumbria, but it is likely to end up here.

Could the other sites become the GDF?

I think the Government should get behind making the decision about the GDF so that the location of this can then be factored in. Can you really see the GDF being in the Home Counties? No. There is a pretty good chance the GDF is going to be here. It could be in Scotland but then there is more politics involved in that.

How many different classes of submarines are there? *(Different submarine classes included set out.)*

Is this going to start early in the next decade then? *(Timetable for planning and construction set out. First RPV arrival at site expected around 2021.)*

### **Post-It Note comments**

## **MOD SDP PSE**

### **Local Workshop Notes**

#### **Cleator Moor Civic Hall and Masonic Centre**

**28 January 2015, 3.00pm**

**MOD representatives present:** Linda Eadie, Mark Ball, Lucy Samuels

**Members of the public present: 6**

The following notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

I presume the LLW is going to Drigg regardless of where the chosen ILW site is?

What is the point of smelting LLW when you already have the Drigg store ready?

Why are you going to choose one site? Why can't we have several storage buildings?

You haven't considered any MOD sites have you? *(Yes, Aldermaston and Burghfield.)*

Do you regard Sellafield as a partial MOD site? *(No, though we have a contract with the NDA.)*

Would the intention be to set this up in the area where the GDF will be built? If you chose Sellafield then this may give some support to having the GDF here, which is the last thing we want to have here, as the geology is not right in this area despite what some say.

Why were Rosyth and Devonport not selected?

What is the reason for storing them whole? Why not cut them up now? *(This is feasible but better to leave them whole and allow the radioactivity to decay.)*

How old is the oldest submarine? *(Dreadnought was laid up in about 1980.)*

You say there is no liquid involved, but there was pressurised water in them. What are you doing with the water? *(The water will have been drained down before they enter this programme, and there are disposal routes for this.)*

How do you intend to transport these about the country? Is it feasible to transport by ship?

You said safety is paramount, but perhaps you should have added 'subject to the impact on the bottom line'.

You mention one transport per year, but you also mention storing them for a short time before the store is built and then transporting more than one per year, is that right?

Are they being decommissioned at two locations? (Yes.)

So if an AWE site were chosen, then the Rosyth submarines would have to be transported all the way down to that site. Is that right? Would it be better to have two sites, so have one at Chapelcross for the Rosyth submarines? (*Cost of building two stores mentioned.*)

I suppose it depends what your safety case is.

You are talking about construction, but are you also looking at utilising a current store if available?

You say there are 27 submarines in this project, but are there more submarines than this?

Based on the assumption that the GDF is available you won't need interim storage for the Astute class submarines will you?

So would the Astute submarine RPVs go straight to the GDF and is the GDF programme aligned to this?

When you have got your planning permission could you just later add an amendment to this to have it extended, if needed for the Astute class RPVs? (*No. The sites need the plans to be clear and they are for the whole life of the facility.*)

(*What do you think of using Sellafield for the site?*) If it is giving any weight to having the GDF here, then no.

I think the opposite to this as I think the GDF should be here. Yes, use Sellafield as it is a doddle compared to other things done here.

We came here worried about what would be done with the fuel, but that has been dealt with and is not in your scope.

We were concerned that you may be proposing another Thorp facility, but clearly you are not.

The Moorside power station project may increase docking facilities at Sellafield, raising ship transportation as a greater possibility.

## **Post-It Note comments**

**Annex E: National Workshop Reports**

## **MOD SDP Project**

### **National Workshops - Birmingham, 6 January 2015**

Stakeholders were divided into three groups, and attended each of the four breakout sessions in turn. The notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

#### **SEA Breakout Session - 11am**

**MOD representatives present:** Jenny Wade (Jacobs), Chris Hargraves, Tom Baldwin, Chris Hodge, Mark Sanderson

An Environmental Impact Assessment was mentioned – would that be mandatory for this? (Yes.)

For Risk Assessment, looking at the source pathway receptor, it would be useful for the public to know what the worse case scenario would be. If something does go wrong, we want to make sure that it has been considered and the public are aware of it. Also, different sites may have different receptors.

Locally, almost top of the list of worries is transportation. Route planning is of particular interest. What level of certainty is there going to be before a site decision is made? When will the route decision be made?

Are these transport routes currently used by the sites for other activities?

On the proximity principle, in terms of transport and the distances from the dockyards, and to the eventual GDF, I think that will be a question that is raised by people. The overall weighting this is given is also clearly relevant.

Which of all the criteria are really going to matter to the MOD, as opposed to those things that will matter to a member of the public? Will there be a gap analysis of the differences between these?

The SEA is bounded by storage, but there was a mention of some processing that could be done. There is a danger that this will not take into account the processing aspect, such as size reduction, within the assessment. It could be viewed that you are salami slicing the problem into manageable chunks and therefore you don't assess the processing. When will size reduction be accounted for in the assessment?

What probability is there that the GDF will happen in 2040? As a member of the public you will have to assess this proposal on the basis that it will be there for 100 years.

This is not interim storage under the definitions.

Important to note that size reduction may not happen on the site where it will be stored and so there could be further transportation. You also need to assess this on the basis of the decay that will take place over time and whether some could then be Low Level Waste.

With size reduction, is it just cutting it up or what segregation is there within that? Is it just cutting up the steel and then assessing if some is then Low Level Waste? (Yes.)

NDA are looking at decay storage, so if you kept it for 100 years what position would you be at? Or if it was kept in this store for even longer?

You talk about ILW early on in the report, but this is with technically aware communities. You don't say in the report early on what this actually is, in terms of steel vessels. There are issues around the public perception of it, so this should be explained.

Strip back the technical language as much as possible.

I wasn't sure what the moderator was in the reactor, such as graphite, but it turned out to be water so this changes the perception of it.

One of the assumptions made is that there will not be any other ILW outside of the RPV. What assessments have been made to validate this assumption? If there is any other ILW it would affect the storage requirement and may impact operational requirements at the site.

You've done a quick assessment, which doesn't fill me with confidence.

Any other ILW materials will not necessarily go to the storage site identified, will they? (No.)

Would the other materials generated go to Sellafield? (*There are other disposal routes available.*)

Are you looking at this holistically? This is a fairly straightforward process to deal with.

The whole bigger picture should be looked at, for the end-to-end process. If there are some uncertainties then say so. There is no harm in saying if you don't have the answers yet.

Whichever site is chosen, the vessel should be able to survive for the hundred years without any attention needed.

These will need to be repackaged before going to the GDF, so what is being provided for this? There is space provided within the store for repackaging, but what are the risks associated with this? What assessment has been made of this?

It feels like there are still some loose ends. You need to be clear about what has been assessed.

## **SEA Breakout Session – 12 noon**

**MOD representatives present:** Jenny Wade, Chris Hargraves, Tom Baldwin, Chris Hodge, Mark Sanderson

There is no doubt it is a thorough SEA and your conclusions are quite sound. I have a few reservations though, the prime one being about Burghfield - more development is happening on the site and this complicates the offsite flood risk at Burghfield. Anything further could add to this flood risk.

How can you factor in more development on the Burghfield site and the off-site flood risk? It is a very complex scenario, for instance you have the main railway line creating a barrier near the site. Many local residents believe development at the Burghfield site is increasing the flood risk for their homes.

I believe there is also further development for upstream of the Burghfield site, so is something factored in for this? There are other non-MOD developments proposed, so that needs to be taken in to account. *(Cumulative effects are taken into account based on local plans.)*

We would imagine this would all come out in an EIA.

If it is only investigated further in the EIA, then that is after the decision on the site has been made and other decisions taken. Then such an issue would either have to be ignored, or you will have to go back to the site selection and choose another site, which will take further time and cost. This cannot just be glossed over. *(We need to be comfortable that it is a deliverable site before selection.)*

Have there been any particular challenges with this SEA?

Can you explain more about the next stages in the process? Who will be undertaking the EIA? *(The operators will be undertaking the planning process. There is more assessment work to be done before a site is selected.)*

## **SEA Breakout Session - 2.45pm**

**MOD representatives present:** Jenny Wade, Chris Hargraves, Tom Baldwin, Chris Hodge, Mark Sanderson

No comments or questions were raised following the presentation.

## **Assessment Process Breakout Session - 11am**

**MOD representatives present:** Linda Eadie, David Collier

Does the assessment process take account of a site managing its own waste/projects?

Issues presented by the public at meetings (eg, security/terrorism) may not reflect issues which could be seen as more important in the long term, eg, equity and fairness. Care will be needed in assigning MCDA weightings to address this point.

The message '*These are just lumps of metal*' is not getting through – so the concern over safety/security is over-weighted.

Your analysis is inward looking – you are reacting to the consultation; but public perception is informed by lack of knowledge. Your proposal generates concern; the instant perception is negative/nuclear is bad. How are you addressing that problem in this process?

Concerned the symptoms you are seeing (eg, questions on terrorism/security) are emotional/illogical. These uninformed opinions are having/could have negative consequences on the local area (eg, for the economy/tourism).

Suddenly 'thrusting' this project into the public domain raises concerns and strange questions, eg on terrorism.

Can the SDP team give feedback to site operators on the need to help local communities understand broader risks from the site?

Will regulatory performance of a site operator be included as an 'Other Contributory Factor' in the MCDA?

How do you balance this? If a site has a very poor regulatory performance, surely that has to carry more weight than some other factors?

Regarding assessing impact on other projects – is this a two-way consideration? ie, are you looking at the impact of the SDP project on other projects on the NDA sites? Not just the impact of site projects on the SDP?

Regarding the MCDA and the mechanics of the process: the weighting/scoring process has been set up by the MOD, and is undertaken in-house by the MOD. What opportunities were there for scrutiny and independent validation of the process?

Will the process differ 'when you do it for real'? Is there a possibility for sub groups/regulatory advisers to do their own assessment process?

The team that did the provisional/initial analysis – was this just done by the MOD? Or were regulators involved?

Concern when you talk about multiple options for sites; do not overcomplicate things by giving a site multiple options for the design of what is essentially a 'shed'.

**Assessment Process Breakout Session – 1.45pm**

**MOD representatives present:** Linda Eadie, David Collier

For transparency and confidence, there was a request to see the greyed-out parts on Slide 5 of the presentation.

Some sites are NDA and some are commercial sites: how has this been managed? Have they been given the same questionnaire/assessment?

Is it the MOD who places the contract with the recommended site, or the NDA/others?

How confident are you in the process, and that you'll come up with the best site/solution? I ask the question because going back to the Decommissioning Project, where was the consultation? We were told it was Rosyth and Devonport.

At the moment all of the sites are very close in scoring.

Surprised to see a private offering/commercial company in the mix. 'There's a profit motive in there somewhere'.

The two sites in the south seem the most obvious as there are more submarines in Devonport than at Rosyth.

Are you engaged with the five sites in how they present their risks, and how do you assess their deliverability?

OCF is generally more qualitative, rather than quantitative.

GDF is a factor but not a differentiator.

A site may expire before the GDF is deliverable: is this a discriminator?

You have *five, good* potential options, which makes a huge difference: it's usually 'Hobson's choice'.

OCF provides a useful differentiator.

Is there a favourite/preferred site?

Regarding 'Legal Discriminators', what sort of risks do you envisage under this OCF?

Regarding 'Commercial Issues', have you looked at the track records of sites?

**Assessment Process Breakout Session – 2.45pm**

Chapelcross will be at a low level of security quite quickly; how do you factor that into your process? Some other sites will have a full police presence.

Have you considered information security?

Regarding the Chapelcross site, which is in Scotland, would the material go to the GDF or stored as per Scottish policy?

It is difficult to make an assessment due to uncertainty regarding the GDF.

Regarding sequencing of decisions; there are a lot of unknowns still regarding certain aspects of the programme, eg, the decision about the container, which could have enormous considerations regarding storage, transport, etc. Do you have sufficient information at the moment to make robust decisions?

Are you progressing on the basis of IP-2? I guess if this changes, it would change for every site.

Once you have done your assessment, who will be looking at all of the data to provide a balanced third-party view/scrutiny?

A request was made to explain the COEIA graph and the weightings.

'I'm not surprised by the Cumulative Through-life Cost Profiles, which comes back to the point on dealing with unknowns.' (*Have we captured the key OCFs?*)

The themes are what you would expect to see; it depends on the organisation. How it affects the decision will depend on each site's response. The challenge is how you get the information from the sites to get the right decision.

You have to consider other parts of the MOD, DECC and local MPs – how does all of that get factored in?

'Local and National Stakeholder Positions' links with 'Planning/Local Plan'. There is an uncertainty it may be there for 100 years – this could be a discriminator. You need to know if the LPA has got plans for the site in the longer term. In Berkshire there is pressure on land; this would be different in Sellafield/different commitment to the site. This should have weighting for the deliverability.

Residents are concerned about planning issues; there is a need to make the public aware. Look at the planning process and what grounds people could object on.

## **RPV Store and Containers Breakout Session – 12 noon**

**MOD representatives present:** Nigel Parsons, Mark Ball, Becky Winston

Do we have assurance it's an enclosed process when the RPV is loaded into a container – from the slide it 'looks like it's swinging around'?

You mention a 100-year design life – will you be requesting licensing for 100 years? What length of time would the first application for the licence of the facility be?

How different is the container testing regime for each of the two options?

Would the container type be dictated by the different journey routes (from Rosyth and from Devonport) to the site?

### **RPV Store and Containers Breakout Session - 1.45pm**

There is a distinction between the two possible types of containers. Who will ultimately determine which is the right one, given the unsure situation around how long it will remain in store?

ONR will be looking at the design in detail and will look at what maintenance is required, etc. DSNR transport requirements are very clear-cut for transport.

What timeline are we looking at for when this will be decided? *(MOD is looking at the design from the transport point of view and storage, including considering the store building design alongside it.)*

There needs to be engagement with ONR early on as it could help with the design of the container.

From the public's point of view, what is the most safe and most secure way of storing this? *(It will be safe and will pass all the regulations.)*

If it needs to be repackaged do you consider that the initial packaging will have been contaminated?

It may be normal business for you but not necessarily for the store operator. As long as you have the appropriate engineering and the safety case in place.

There is a large assumption that there will be no liquids present and no loose contamination. If they need to be repacked, if there is any potential for those hazards to become a problem, then that needs to be included in the design of the container.

You have included the option to repackage within the store. *(We are allowing space to repackage into a new container, if required.)*

You have to look at the worst case and assume that there will be some contamination found during repackaging, so you will need to design the repackaging facility to cope with this.

Need to consider degradation to the external surface and seals, etc over the storage time. Will you want to include some insulation in the store?

From a financial point of view, if you have more than one site that is appropriate why don't you go into contract negotiations with more than one to get the best deal? *(Financial aspects are taken into account within the assessment.)*

You have two generations of RPVs, which you say have the same level of radioactivity, so why do you need local shielding for the second generation? *(They will not have been laid up for as long as the first generation so this may be required.)*

On repackaging, it is not for radiological reasons but because transport regulations may have changed. It is important to get this across to the public, as it could be assumed that they have degraded.

So would the cutting up only be needed for the second generation? *(It is baselined as possible for all, but we are working with the GDF programme to agree requirements.)*

If cutting up is required, would this be done off site? *(Yes.)*

So could a UK facility for size reduction also be on one of these five sites? *(Yes, it could be.)*

You said you will start to deal with Low Level Waste from 2016: will you remove the RPV then? *(No, we will not deal with ILW then.)*

What is the drop withstand for the IP2? *(A 30cm drop.)* You need to go through the process of considering drop heights, the surface, how the containers are handled and moved, etc during the design process.

Will the LLW from the submarines be going to the Low Level Waste Repository near Drigg? *(Only about 10% has gone to the LLWR near Drigg so far.)*

You mentioned one movement per year, but you have also said there could be up to three in the early years. Can you clarify this?

Just how much bigger is a type B container? *(The 90 tonnes load would move up to about 190 tonnes load.)*

You said there is the potential for external contamination on the RPV. Would you have any need to do decontamination on site? As long as you can be sure that any external contamination does not stop it being possible to put in the container then this would be fine.

## **RPV Store and Containers Breakout Session - 2.45pm**

Interested in characterisation of RPVs – gamma radiation cobalt 60 is the one that impacts us. Would like to see an assessment to show lack of discharge. Can still get some discharges, eg Tritium can get absorbed into gas: you need a report to say this is not credible. *(Look to owner of site as it is their radioactive management case that needs to be scoped.)*

How many subs still need defuelling? (*Eight in Devonport – but not relevant to this project.*)

Any scope to re-use package transport containers? (*We use one per RPV. We did look at reusing it but this is not the way forward in our opinion.*)

The first submarine to be dismantled is HMS Swiftsure. Am I right that it is a demonstrator and you will take benefits for future? (*We are using desktop exercises and CAD exercises. Swiftsure will take about two years – more than what we anticipate routine to be. We have built in flexibility to ensure we work out the most efficient ways and check if we need any facility changes to increase efficiency and improve rolling programme. Yes, there are checks to ensure MOD reputation is good: MOD retain oversight of Babcock. We are involved in the process all the way through including how we learn from experience.*)

**Post-it Note comment:** ‘When planning permission is requested, MOD should require the site operator to provide pre-application information to local members of the public (not just statutory consultancies and institutional stakeholders).’

## **Planning and Permitting Breakout Session – 11am**

**MOD representatives present:** Christine Bruce, Stuart Fowell, Stuart Patten, Lucy Samuel,

What were the security concerns from the general public? (*Concerns were regarding the transit of Reactor Pressure Vessels (RPVs) rather than on site concerns.*)

Were they worried someone would pinch one? (*Some were concerned: they showed a lack of understanding. We reassured them that there will be a security escort during transit and we highlighted the size of the RPV. Plus it is not like a dirty bomb that can be taken to be used.*)

Information security: was there concern from public regarding this and is there concern from the project team? (*No, plus there is a full-time project person making sure it is handled properly.*)

It is not really a nuclear safety issue, it is radiological safety issue: you need to change the emphasis. The brief has too much nuclear focus; it confuses the public. However, it is hazardous material so you need to be clear about that. (*Yes, some of the public were not aware it is just the RPV being talked about with no potential for any fission.*)

The most important element is public consultation regarding planning permission.

Infrastructure for transport is key.

How safe and sealed is the container, eg, if the vehicle crashes what will happen?

An environmental impact statement is vital.

It will take minimum of a year for the planning application to go through. Even if the application meets all the criteria and is passed it can still be called in by the Secretary of State. All elements have to be covered off properly. *(We have due regard for the planning process – it is a key risk for the project and key to the project success.)*

I assume the decision has been made that it is not a national planning project? *(The project has had legal opinion that it is not a nationally significant project: it does not meet the threshold. Similar projects have gone through on a local planning level.)*

There is a formal pre-application process. Has the Environmental Impact Assessment (EIA) scoping stage been factored in? Pre-application consultation is key and encouraged by planning departments.

Is there any ancillary development likely to come in alongside this? *(Our understanding is that the store will have extra space but only to allow for future repackaging.)*

Where will the size reduction facility be? *(We hope that by then there will be a national facility, so no assumptions have been made, certainly not that resizing would be at the store site.)*

## **Planning and Permitting Breakout Session – 12 noon**

Will there be a planning performance agreement? This is support for the council that picks this up. *(MOD has just done its first planning performance agreement. It will be up to the site officer to set up an agreement. It depends on which site gets the proposed store. We are aware of a potential requirement and it will be considered.)*

If you are selling this to electors, what is in it for community? If there are costs incurred for the planning procedure, what payback is there? Will it be paying business rates back into the community?

Looking at longer term, the RPV storage could get in the way of some other use of the site. For example, the security level on a lot of sites would be down to no security staff on site, so you need to know the long-term prospects.

The MOD case shows that the store and monitoring can be maintained for 100 years. This will influence public opinion: there is a big difference between 40 and 100 years. You have not looked in detail at the end of the storage period and need to be consistent regarding saying whether RPVs will need to be repackaged after 40 years.

Safety is a moving feast depending on time scales. Early engagement is very important to ensure the public get no surprises regarding what we are looking at. The MOD need to ensure it is not just an advert in a newspaper: you need parish councils to be fully aware of the proposals so there are no surprises.

The case indicates that permitting of the site and the scope of activity on the site is limited to transport to the site. A safety case will need to look at all activities on the site: these need to be declared up front. If taking a narrow view on these activities there is a danger that important activities are not being considered at the front end which may

lead to delays at the back end. *(Store design includes extra space only to allow repackaging but we are not sure what that looks like as yet: it is assumption, not fact.)*

Is there a role for the Defence Nuclear Safety Regulator (DNSR) in the safety case and design? *(DNSR has a regulatory role in the transport of RPVs to the site but not in the operation of the site. However, DNSR are bound to take an interest in the operation of the site despite not having a regulatory role as they will be responsible for regulating transport at the far end.)*

We need timelines for things still to be decided or determined, eg container design and assumptions around repackaging, as these will influence the site that is chosen. *(The interface for the transport container getting onto the site needs to be certain. There may be the opportunity to transport RPVs to the Geological Disposal Facility (GDF) without repackaging them so we need to take account of whatever requirement may be needed.)*

Regarding repackaging, are you just craning them out of the submarine into the container? It would be useful to explain to the public if this essentially is what repackaging the RPVs is. It shows there is much less risk than was already done at extraction – one steel box to another. All operations for repackaging will have been done before, the danger is all the detail and overcomplicating the message to the public when you're trying to get backing in communities

### **Planning and Permitting Breakout Session – 1.45pm**

Processes between Scotland and England are different. The Environment Agency process is much simpler than has been outlined in the presentation. Holders of permits have got discharge permits already. We are not expecting to see anything in real terms of discharges. We would not consult on such a minor thing as this project but we do confer and communicate. Under the environmental umbrella this is radioactive waste and we would be interested regarding who will own it from start to finish. We will capture information regarding the way information is going to be handled from the submarine to its final disposal point. The Environment Agency would only be interested regarding approving the person who is taking it away.

Scotland will have to go through named site and consultation.

Planning permission at Rosyth is an example when the community were not fully informed regarding the application for planning. Informing community councils does not always take place properly for MOD sites. I am not sure it will be enough to rely on councillors to update the public. Would the MOD require the site manager to actively inform local public? *(Once a site is identified it is the responsibility of the site manager to manage the planning application. MOD may have to say they need to do more than they normally do.)*

It is normal practice to have local stakeholder groups. They are good vehicles for communicating this kind of intention before proceeding with anything formal. Councillors, neighbouring businesses and interested parties. Local liaison committees

are not working at the moment. Often they are very much a closed shop. It needs to be broader looking than that.

Security regulation at MOD sites – DNSR – is there a regulator in security for the site? *(Yes there is – Defence Security lay down requirements for MOD site and information security.)*

Do they audit compliance? *(Yes.)*

Most members of the public do not know much about independent regulators, let alone internal regulators. Would MOD reassure the public that standards are robust without seeming like a closed shop? It is about building confidence. *(Standards are different on sites depending on different threats. MOD can make statements on adequacy of arrangements. May have to keep some things secret for good reasons.)*

## **MOD SDP Project**

### **National Workshops - Glasgow, 8 January 2015**

Stakeholders were divided into two groups, and attended each of the four breakout sessions in turn. The notes set out the main questions and comments made, followed by responses and further comments made on the subjects raised.

#### **SEA Breakout Session - 11am**

**MOD representatives present:** Scott Johnson, John Davis, Chris Hargraves, Mark Sanderson, Nick Brown, David Wells

Will Low Level Waste be stored at Sellafield or at the Low Level Waste Repository near Drigg? (*At LLWR near Drigg.*)

The ponds on Sellafield are starting to deteriorate.

You said that you will be undertaking an EIA on the selected site. Presumably that is to be submitted as part of the planning process. Is there then a need to consult specifically on that EIA? (*Yes.*)

Regarding the LLWR near Drigg, it has just got an extension to its capacity, but once that is full where will you put the LLW?

Is it possible the facility will look very different to the designs you have discussed? For example, could it be joined in with an existing store?

Will this opportunity of joining to another store be taken into the assessment of the sites?

Given you don't have a detailed design and all the data for the chosen site, is there a risk that when you have selected down to one site you may then find that you have not selected the correct one? Will there be a back-up site?

Until you have done the detailed design and assessment there is always a risk.

How do you know that the SEA results you have got are right?

Will 100 years be long enough before you get a GDF? It will take a long time to develop a GDF and only West Cumbria is currently interested in hosting it.

There is a lot of scepticism about the relaunch of the GDF plans and it seems to have been kicked in on the long grass. Our fear in West Cumbria is that we are going to get the GDF and we are going to get everyone else's nuclear waste in the meantime.

## **SEA Breakout Session – 12 noon**

**MOD representatives present:** Scott Johnson, Chris Hargraves, Mark Sanderson, Tom Baldwin

It seems unlikely you would get to put this in the GDF in the first two years, so saying you expect to dispose of this in 32 years is misleading. I can't see why this waste would get to go into the GDF before much of the high priority waste at Sellafield.

What consideration has been given to any cumulative impacts, given what is going on at many of these sites already, and how would this impact on the SEA?

In terms of transportation and impact, to what extent are you considering the sea route?

What is the dosage from the reactor within its storage container?

In summary then, for all five sites your assessment is that there is no significant environmental impact, so you haven't discounted any of the five sites. *(Correct.)*

Did you say where you are going to do the size reduction?

Local communities don't have much trust in the planning process and you often get further applications later for changes or additions to plans, hence a concern about where the size reduction will be.

According to the timescales, you may be looking at size reduction within four years of the store? Both the four years and 32 years mentioned on the slide seem to be nonsense. *(Clarification given of these times and what was meant by them.)*

Do you still have a hope that the RPVs may be able to go into the GDF intact?

Would you anticipate that the size reduction would happen at that point, or would size reduction wait until the GDF is a clear prospect? *(We would wait until a disposal route is ready.)*

Is there a possibility that some of the final packages don't actually need to go into this store and may be able to go straight into the GDF? *(Yes, this is possible).*

Can we get copies of these slides sent to us afterwards? *(I'm sure that wouldn't be a problem.)*

I raised the issue before about the new submarines not being included in the 27 and this raising some uncertainties. There may have to be more than one GDF with current plans, so you may have to wait much longer before you can use a GDF facility.

## **Post-It Note comments**

Slides for the SEA presentation say operation of stores is expected to last 4-32 years. It seems so unlikely the GDF would be ready to accept submarine waste by 2050 that this assumption should be looked at again.

Concerned about the assumption that waste from post-27 submarines would go directly to the GDF.

Looking at some Government scenarios for nuclear new build a GDF could fill up relatively quickly – so it's possible that there would still be no facility for new sub waste.

Why is there a difference in security scoring between sites? One would expect security to be the same across all sites – same fence, same building, same guards.

### **Planning and Permitting Breakout Session – 1.45pm**

MOD representatives present: Christine Bruce, Stuart Patten, John Davis, Stuart Fowell, Tom Baldwin

As with nuclear power stations, the Scottish Government's power mainly relates to planning. Given that a Scottish Minister has already said 'over my dead body', is it worth continuing with the Chapelcross site?

It seems that you are not requiring any derogations at all, is that correct?

Why should it not be treated as civilian waste, that is that it will not go to the GDF?

The Scottish Government's view is that it is up to the UK Government to make the decision. We can't pre-judge any planning application, but if Chapelcross were chosen then we would have to see what view is taken.

If the Local Planning Authority does or doesn't grant planning permission, I would assume that is down to whether the local community wants it or not.

Whilst it might be that the public express their views, once the planning application is submitted it will be decided on material planning grounds.

Who is the relevant planning authority on this? (*Depends on the site. Each site set out.*)

Does the number of public objections, based on planning grounds, bear any relevance?

If it is called in, for instance by the Scottish Government, would the decision still have to be based on planning grounds? (*Yes.*)

If there were lots of objections but they were for the same thing, then that would be different from a large number of different objections.

Even if there weren't going to be any discharges, would you still have to put in a permit application? *(Yes. If it were a new practice on the site, then you would need to put in an application.)*

If the site already has permitted discharge limits and there would not be much change, would you still have to put in a permit application? *(Yes, but you may not need to consult on it.)*

In the permit application are you still having to say how you will finally be disposing of this waste? If the GDF were still some way off, then what would you say in the application?

Are the larger RPVs likely to be a problem for disposal to the GDF? *(They will need size reduction.)*

I take it you haven't started dismantling anything yet? *(Not yet. To begin in 2016, but nothing with the RPV until we know we have a store that has consent.)*

So how many submarines will you be taking Low Level Waste from to start with? *(One, from about 2016 to 2018.)*

#### **Post-It Note comments**

Would the site require a waste management licence?

The Environmental Permitting needs reviewing, as it does not appear to reflect the impact of the site licence on the responsibility for storage of waste.

#### **Planning and Permitting Breakout Session – 2.45pm**

**MOD representatives present:** Christine Bruce, Stuart Patten, Stuart Fowell, Nick Brown, David Wells

If the Scottish site is selected, is there anything in SEPA or Scottish Government regulations that would prevent the RPVs from Devonport going there?

So it wouldn't come under the remit of cross-border transfers?

The Scottish Minister might be likely to call the application in.

With the reference to the GDF, the slide says in 2040; maybe it should say, 'if it is there then'?

It seems that the planning and permitting aspect is all laid down and set.

I'm not sure if on the selection criteria for a site there was anything about how easy or difficult it would be to get planning permission for the site. Surely this difference between the sites should be considered? *(Planning risk is one of the top project risks.)*

It would be a shame to select a site and announce it and then not be able to get planning permission. Is there any process that has been gone through to see how difficult this may be for each site?

It all boils down to if your intention is to select down from five sites to one site and go forward with that, or alternatively you have a back-up site as your plan B if the first site fails.

There will always be objections from many groups, such as Friends of the Earth, whereas if the word 'nuclear' were just taken out then they would not be objecting.

As they are all licensed sites this mitigates the risks considerably.

### **Assessment Process Breakout Session – 11.00am**

**MOD representatives present:** Linda Eadie, David Collier

I am surprised there is so much emphasis on the 2040 date; you may need longer than 100 years (if there are issues with the GDF programme).

Will the store survive longer than 100 years if necessary? (*Policy is to design for 100 years.*)

Are you looking at whether there is room on a site to build additional/alternative storage, if required?

Reference was made to an article in *Town & County Planning Magazine* (December 2014) by Prof Andrew Blowers, and that the emphasis is on having storage. (*MOD is aware of this article.*)

Concern about the store being used for other ILW/shared facilities. The public may prefer to see separate storage, not shared.

Hunterston store is having problems regarding contamination. Investigate this to understand similarities/risks.

Has there been any consideration for having two sites for storage?

If you have just one site you may end up 'having all your eggs in one basket', eg, if there is an issue with planning permission/the ages of buildings.

To what degree is the nuclear element driving the decision/feeding into the analysis? Essentially, it is just a shed; for Sellafield this is not even on the 'radar of danger'.

To what extent can the local community/site shape the (detailed) design of the store?

Are the five sites in competition with each other?

Are the sites proposing the design? Or the MOD?

Do you give a concept for a store initially (to help with the questionnaire)?

The dismantling element isn't in competition is it? Just the storage?

You are asking for flexibility in the sites, but people may be concerned it will be 'the thin end of the wedge'. What about other submarines beyond the 27 RPVs? What about future plans for decommissioning other/successor submarines? Has this been raised in the public consultation?

GDF is mostly about much more High Level radioactive Waste. This is just a logistical exercise and is no way in the same category as what the GDF has been designed for. In my community (Cumbria) this isn't a concern; employment opportunities are much more important.

Some may say this is overkill for something not terribly dangerous. But this level of consultation is correct; it's other projects that are wrong/have been inadequate.

The Cumbrian community has a level of knowledge about nuclear, so it looks at the opportunities/benefits, not just the danger.

### **Assessment Process Breakout Session – 12 noon**

Regarding the dismantling skills and experience box, that is greyed out as part of your socio-economic input on Slide 5. There is nothing on Slide 8 that shows where you are going to get the skills/workers from to undertake this. Would you be putting money into the West Cumbrian area to train people, or would you look to 'poach' them from somewhere else?

With the problems Sellafield has with HLW, why would they take LLW? [*Query from HJH – surely this should be ILW? David can you confirm if you recall the comment?*]

No one will take GDF in their area. The question of whether the GDF is safe has to be answered; otherwise it will not happen.

Back to skills and availability of labour force, do you have numbers on the skills/labour that will be needed to maintain the facility?

How have you derived the weighting for each of the factors in the MCDA tree?

Are you committed to getting a single site answer, or would you consider more than one?

With reference to 'Unplanned Radiological Release – Storage' (purple box on Slide 5), what have you considered regarding this? I have been contemplating what could possibly go wrong, and cannot think of anything.

Regarding the workers in the storage plant, I hope they would not be in the store very long each day. My concern is there will be some gamma in the store; not huge rates, but some.

Regarding terrorist threats, will you have an exclusion zone in the air? There's a three-mile exclusion zone around Sellafield. This gives the public confidence; it takes the risk away.

### **RPV Store and Containers Breakout Session – 1.45pm**

**MOD representatives present:** Nigel Parsons, Mark Ball

Where will the transportation container be constructed? The taxpayer will get a better return if it's made in the UK.

Sellafield transports its waste in and out, so the concept/facility is already there. Have you considered barge transportation?

Your presentation cites 2040 GDF availability, but the GDF may not go ahead; what would you do then?

Fire is a major hazard in relation to transport. How are you going to seal the transport containers?

There are requirements regarding fire resistance for a certain length of time/minutes.

Are the temperatures of the RPVs an issue now?

### **RPV Store and Containers Breakout Session – 2.45pm**

Is the first submarine you are working on in Rosyth the oldest one? With that vessel how much decay has taken place? What is the dose rate from the vessel now, without it being in its shielding?

You say there will be plenty of space in the store. The local community may like to see it full, as they may think additional waste will be stored there.

Planning permission and regulation is not likely to reassure the public.

You need to make it very clear as to why you have additional space in the store. You need to give reassurance and explain it's there for a purpose.

Have you considered the security risks/terrorism threats?

Are there any atmospheric control requirements?

What about the possibility of discharges? Is it worth monitoring the area?

It would not get onto a site if there was a chance of any discharge.

If you had to repackage it could there be some loose contamination?

# **Annex F: Submissions from Organisations and Elected Representatives**

---



c/o Chapelcross  
Nr Annan  
Dumfriesshire  
DG12 6RF

JMC/RO

22 January 2015

Submarine Dismantling Project  
FREEPOST RSKJ-KRAH-YZRJ  
C/o Instinctif Partners Ltd  
4<sup>th</sup> Floor, Dukesbridge Chambers  
1 Duke Street  
READING  
RG1 4SA

Dear Sir

### **MoD SUBMARINE DISMANTLING PROJECT**

I write as Chair, on behalf of the Chapelcross Site Stakeholder Group in response to the consultation on the proposal for the interim storage of intermediate level radioactive (ILW) waste on the Chapelcross Site.

In addition to a presentation given to the Site Stakeholder Group at a Meeting last year, Site Stakeholder Group Members have also attended various workshops and presentations in Annan, Dumfries and Penrith, where a great deal of information was obtained and questions raised.

We believe under the current proposals, that have virtually no socio economic benefits to the local area and communities surrounding the Site such as additional jobs and community fund, the Chapelcross Site Stakeholder Group would be opposed to the storing of MoD submarine waste on the Chapelcross Site.

Yours faithfully,

Cllr Ronnie Ogilvie  
Chairman  
Chapelcross Site Stakeholder Group  
C/o Jill Callander, Communications  
Magnox Ltd,  
Chapelcross  
ANNAN DG12 6RF

Site stakeholder groups (SSGs) are an independent, local community body acting as a link between the site and its neighbours

Submarine Dismantling Project

Date: 19<sup>th</sup> Feb 2015

Dear Sirs

**CONSULTATION RESPONSE TO THE INTERIM STORAGE OF INTERMEDIATE LEVEL WASTE (ILW) STORAGE SELECTION ON THE SUBMARINE DISMANTLING PROJECT (SDP).**

The Council welcomes the opportunity to comment on the options for the proposed locations of an interim storage facility for Intermediate Level Waste (ILW) from the Submarine Dismantling Project (SDP).

The Council has carefully assessed the options currently tabled and the matter has been considered by the Council's Strategic Nuclear and Energy Board at a meeting held on 17<sup>th</sup> February 2015.

The Council has welcomed the robust consultation undertaken by the MOD which included extensive letter mailing and 4 workshop events in the Copeland area. The Council would urge that the MOD continues to demonstrate the adequacy and effectiveness of consultation through appraisal and weighting of concerns and opinions expressed.

Transport is listed as one of the criteria used to assess suitable sites, however in the Strategic Environmental Assessment scoping report there does not appear to be an adequate assessment of the potential negative impacts of transporting RPVs through Cumbria's highly constrained road network. The Council has particular concerns as the A595 which serves Sellafield is already in need of major investment to maintain and repair what is a vital piece of the infrastructure.

The super trucks required to transport the RPVs will only serve to exasperate the deterioration of the A595 further. Considering that the A595 will also be under additional pressure from 2018 onwards, if the proposal for a new nuclear power station on land adjacent to Sellafield is approved, then the additional burden that transporting these RPVs to Sellafield will place on the road infrastructure is unacceptable.

The Council is satisfied that the proposed storage facility could be managed in a manner which would insure that the risk to the surrounding environment, of potential contamination, from the storage facility is minimal and that the Sellafield site as a competent nuclear waste management site operator could efficiently manage the risk. However, as stated within the strategic environmental assessment Sellafield has a "comprehensive suite of waste management facilities to treat and

dispose of the waste arising from the commercial and decommissioning operations or reprocessing". Therefore the Council's concerns do not arise from Sellafield's capability to manage the interim storage of the ILW but the sites capacity to accommodate a large store on a site where there is a significant competing demand for space to accommodate development which is of far greater value to the Country's decommissioning and nuclear related development requirements and ambitions.

The Sellafield site is unique with specialised reprocessing and decommissioning skills and facilities along with a highly skilled workforce with many years' experience in dealing with High and Intermediate level wastes.

The proposed development would occupy a substantial amount of space on what is a premium nuclear licenced facility requiring very little skills or labour. The Council is concerned that the allocation of this land, to a storage facility, fails to effectively utilise those skills and brings little or no significant added value to the local community.

Development of a storage facility has the negative impact of inhibiting the overall decommissioning strategy of the site and the scope for the future development of the site as a centre of excellence for nuclear waste management and reprocessing. The potential for Sellafield to be a national / international leader in the nuclear waste management field is recognised by the Department for Energy and Climate Change and by the Department for Business Innovation and Skills.

The Council notes that within the design specification it states that there will be a 50% footprint contingency as it is assumed that the RPV transport/container will not be suitable for onward transport and repackaging of the RPVs will be required at the end of the interim storage. This aspect of future work and development has not been fully explained in the consultation process and is something that the Council would seek further clarity on.

The current proposed project offers little community benefit in the way of providing a need for specialised skills and creates very few jobs. The MOD has stated that they will not be offering any financial community benefit as part of the project. The development therefore provides no community benefits, and few socio-economic benefits with the potential for this building to occupy what is a scarce resource which could potentially be used for other more beneficial proposals.

Sellafield already hosts over 70% of the UK's nuclear waste and until a final site for long term storage is located the council does not support the storage of this waste here, in conclusion the development would not be in the best interest of the local community.

Yours Faithfully



Cllr Elaine Woodburn

Leader of the Council

19<sup>th</sup> February 2015.

Submarine Dismantling Project (SDP)

## **Consultation on the Site for Interim Storage of Intermediate Level Radioactive Waste**

CORE submits the following comments on the above SDP Consultation and is content for them to be published by MoD. The comments are prefaced by our view that:

- 1) The failure of the MoD to ensure that a management plan for submarine ILW wastes has not been formulated until now – decades after the reactors' first use - is to be deplored
- 2) The responsibility for the management/disposal of decommissioned submarine reactors rests solely with the Ministry of Defence and must not be offloaded to the civil nuclear licensed sites.
- 3) Any further development of the UK's nuclear powered submarine fleet must be put on hold until a publicly acceptable plan for the management/disposal of existing submarine ILW has been officially adopted.
- 4) The MoD view that a Geological Disposal Facility (GDF) will be available around 2040 is supremely optimistic, ignores the myriad of unresolved feasibility issues relating to such a facility and neglects to consider the realistic possibility that a GDF will never materialise in the UK. MoD's plans for the interim storage of submarine ILW therefore need to be refined to take account of an infinitely longer period of storage and the prospect of indefinite storage.
- 5) The proposed storage facility for submarine ILW should a) be a stand-alone facility used exclusively for that purpose, b) have its storage capacity limited only to those volumes of submarine ILW that are currently projected, c) exclude any future consideration being given to the sharing of that capacity with ILW derived from non-MoD sources.

Whilst it is CORE's view that an existing MoD site is the most logical and therefore preferred site for the interim storage of submarine ILW, we have also given some consideration to the other civil nuclear sites shortlisted for this consultation. None appear to fully meet the criteria laid out in the screening report apart from Chapelcross whose full Care and Maintenance phase scheduled for 2028 would be unfairly and unnecessarily frustrated by the import of submarine wastes for interim/long-term storage.

As a campaign group with over thirty years of experience of Sellafield, we are fully conversant with the site's management, commercial operations, high hazard legacy wastes, plutonium stocks and decommissioning programmes and timetable, and would strongly oppose the use of the West Cumbrian site for the storage of submarine wastes.

For irrespective of the recent removal of Nuclear Management Partners as Sellafield's Parent Body Organisation, we have major reservations about the ability of the Nuclear Decommissioning Authority's (NDA) to take on any extra commitment in terms of nuclear waste storage. The criticism of the NDA's poor project management at Sellafield - recently levelled by a number of Government committees – supports our view that the Authority's original remit of clean-up and decommissioning has already been widened to an extent that the NDA has become overstretched to a point where its judgement and performance have become adversely affected (CORE's evidence to the Public Accounts Committee, 18/10/13). The distraction of playing host to submarine ILW will be a further hindrance to Sellafield's already delayed clean-up and decommissioning programme at the expense of the imperative of hazard and risk reduction

On the above basis and with both Sellafield and Chapelcross located remotely from where the major submarine decommissioning programme will be undertaken, it is CORE's view that both sites must be ruled out as candidates for the storage of submarine ILW and that MoD focus should be concentrated instead on its own short-listed licensed sites at Burghfield and Aldermaston.

Of these two sites, the site at AWE Aldermaston has the greater potential in that a) it is already involved in the management and storage of ILW and other higher activity wastes arising from MoD's strategic weapons programme, b) it is capable of hosting a new ILW storage facility within the confines of its nuclear licence footprint and c) it already satisfies the functional requirements, programme and restraints as documented in MoD's Final Criteria & Screening Report Issue 2.0, June 2014 at Annex F. For its part, Burghfield should be ruled out on the basis that it has no current ILW storage regime in place and would also require an extension of its nuclear site licence.

In logistical terms, Aldermaston has the significant advantage over all other sites of being located closest to Devonport where the removal of the majority of the submarine reactor cores will be undertaken (currently 11 of 19). This minimises the risks inherent in the cross-country transport of radioactive nuclear materials, particularly the movement of solid ILW over unnecessarily long distances. We understand, from our visit to the consultation's 'drop-in' session at Cleator Moor on 28<sup>th</sup> January this year that the transport options relating to AWE Aldermaston are currently confined to road haulage. In the event that the AWE Aldermaston site is selected, we believe that the potential for a combined sea and road option should also be investigated by MoD, with the initial transport of the reactor cores being made by ship from Devonport to suitable neighbouring ports, thus reducing overall road transport distances whilst still connecting with the M3 and M4 motorways closer to AWE Aldermaston

Whilst 11 of the submarines to be decommissioned are already at Devonport and a further 7 at Rosyth, no information appears to have been given to the proposed location for decommissioning of the remaining 9 submarines that will fall due for retirement over the coming years. In the interest of adhering to the international principle of restricting the spread of radioactive wastes whenever possible, Devonport should be designated as the decommissioning location for these remaining submarines.

**19<sup>th</sup> February 2015**

25 FEB 2015

Your Ref:

Our Ref: G/34 SR/MS

20 February 2015

Submarine Dismantling Project  
FREEPOST RSKJ-KRAH-YZRJ  
c/o Instinctif Partners Ltd  
4<sup>th</sup> Floor, Dukesbridge Chambers  
1 Duke Street  
READING  
RG1 4SA

**Planning and Environment Services**

Director

Kirkbank House

English Street

Dumfries DG1 2HS

Any enquiries please contact

**Alistair M Speedie**

Direct Dial 01387 260376

Fax 01387 260188

E-mail [alistair.speedie@dumgal.gov.uk](mailto:alistair.speedie@dumgal.gov.uk)

Dear Sirs

**MOD SUBMARINE DISMANTLING PROJECT  
RESPONSE TO PUBLIC CONSULTATION**

I am writing to advise you that our Council's response to the public consultation was agreed at the meeting of our Community and Customer Services Committee on 19 February 2015. I attach for your information a copy of the report that was agreed by Members.

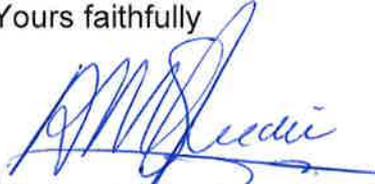
The outcome is that our Council is opposed to the proposals for storage of Intermediate Level Waste on the Chapelcross site for the reasons outlined in the report. These can be summarised as:

1. The lack of any wider benefits to the local economy and community arising from the proposals.
2. Concerns that the impact assessment does not reflect any potential risk to the wider strategic aims of the Chapelcross decommissioning project and the objective to create an economically sustainable future which is set out in our Local Development Plan and the Scottish Government's National Planning Framework 3. We do not agree with the neutral socio economic impact as assessed in the Environmental Report.
3. Concerns that the choice of Chapelcross for this project would create a precedent for future acceptance of off-site waste, potentially undermining the aims set out above. Chapelcross, unlike any of the other shortlisted sites, is at a critical and sensitive stage of a strategy to mitigate the impact of the decommissioning process by creating other forms of economic and business growth close to the site. We are working closely with Magnox and the Nuclear Decommissioning Authority to deliver that strategy.
- 4./-

4. There are some factual inaccuracies and omissions in the SEA in relation to the identification and location of some of our region's heritage assets including the Castle Loch Special Protection Area which is within the 10km zone, the start of Hadrian's Wall which is within the 5 km zone, and various on- site relics from previous use as a WW2 airfield.

I trust this is of assistance and look forward to hearing further about the outcome of your consultation.

Yours faithfully



Alistair M Speedie  
Director Planning and Environment Services

Enc

## **RESPONSE TO THE MINISTRY OF DEFENCE CONSULTATION**

### **SITE FOR INTERIM STORAGE OF INTERMEDIATE LEVEL RADIOACTIVE WASTE FROM FUTURE DISMANTLING OF NUCLEAR SUBMARINES**

#### **Summary**

We welcome the opportunity to respond to the Ministry of Defence consultation on the scope of its Strategic Environmental Assessment (SEA) for the next stage of the Submarine Dismantling Project (SDP). This stage of the project will address the management of Intermediate Level (radioactive) Wastes (ILW) arising from the dismantling of up to 27 de-fuelled and redundant nuclear powered submarines.

We have been engaged with the Ministry of Defence and with other regulatory bodies to provide advice and guidance during the preparation of the Strategic Environmental Assessment and development of site specific options for the management of the Intermediate Level Waste that will arise from the decommissioning of redundant nuclear submarines.

We strongly support the Ministry of Defence's plans to dismantle submarines, removing legacy radioactive and hazardous wastes and recycling the remaining hulls. The Ministry of Defence's delivery of the Submarine Dismantling Project is a vital step in managing its legacy wastes. The Ministry of Defence will need to prioritise the funding and implementation of this project through to completion.

#### **1.0 Introduction**

- 1.1 This consultation takes forward planning for project delivery after initial dismantling and removal of radioactive wastes, and focuses on where to store ILW, up to the time when a permanent disposal facility becomes available.
- 1.2 We have reviewed the SEA Environmental Report and supporting consultation documentation. We have concluded that there is no evidence to indicate that any of the candidate sites in England should be excluded from the selection process. All four candidate sites in England (Atomic Weapons Establishment (AWE) Aldermaston, AWE Burghfield, Sellafield Limited and Capenhurst Nuclear Services) could be taken forward. However, AWE Burghfield might present the greatest challenge in terms of flood risk management.
- 1.3 Our detailed response to the questions raised in the SEA Environmental Report is provided below.

## **2.0 Reactor Pressure Vessel (RPV) storage arrangements**

### **Question 1: Do you have any comments or views on the proposed Reactor Pressure Vessel (RPV) storage arrangements?**

- 2.1 We have concluded that an ILW Store could be constructed and operated at any of the candidate sites in England without a significant adverse impact on people or the environment. We support plans to manage these legacy wastes in a form that will eventually enable their safe disposal.
- 2.2 We have reviewed the SEA Scoping Report and Environmental Report. In our view, all of the four candidate sites in England could potentially accommodate a store for the 27 Reactor Pressure Vessels. There appear to be no overriding issues which would have such a significant impact on specific site selection or construction that it could not be resolved during detailed assessment, permitting, planning and construction.
- 2.3 At Sellafield, Capenhurst and AWE Aldermaston a store could be constructed on the existing Nuclear Licenced Sites (NLS). At AWE Burghfield the current NLS is not large enough to accommodate a store. If this site were selected the size of the NLS would have to be increased. Regulatory responsibility for the area covered by the nuclear licensed site lies with the Office for Nuclear Regulation (ONR), with whom we would work as part of any NLS extension process. It is essential that flood risks would need to be considered and assessed in some detail if AWE Burghfield is selected as the preferred site. The site selection processes have ruled out the possibility of storage at the sites where the waste would be generated. Therefore, it will be necessary to store the ILW at a location which is remote from the point of generation. We note that consideration has been given to the impact of transporting ILW from the sites where the waste will arise. Normally, the proximity principle would be relevant to choosing sites for waste storage. The Ministry of Defence has indicated that at this stage it is not possible, due to uncertainty of the location for a future Geological Disposal Facility and a potential size reduction facility (should that be required), to assess fully concerns about the locations for storing and managing this waste i.e. the proximity principle for waste management.

## **3.0 Strategic Environmental Assessment (SEA) Scoping Report**

### **Question 2: Have you any comments on the Strategic Environmental Assessment or other information presented on environmental issues?**

- 3.1 We provided comments on the SEA Scoping Report in March 2014. The SEA has not been updated for the latest consultation, however we note that a very detailed environmental report has been published in which information on the candidate storage sites has been updated.
- 3.2 We note that the points we raised in our March 2014 response to the SEA Scoping Study have been addressed in the SEA environmental report and

documents prepared to support the SEA and consultation. We welcome the Ministry of Defence addressing the impacts of interim ILW storage over the lifetime of this stage of the Submarine Dismantling Project (SDP), i.e. up to the point where a permanent disposal option is available and can receive SDP ILW, including construction of a robust, weatherproof facility.

- 3.3 We have discussed with the SDP team how the Ministry of Defence should take into account cumulative development on candidate sites where construction of an ILW store might need to be viewed alongside significant non-SDP development. This is particularly important at AWE sites and at Sellafield. Housing and other development near AWE Burghfield and offsite development at Sellafield, including a proposed new nuclear power station at Moorside, adjacent to the existing NLS, need to be taken into account.
- 3.4 We expect to see detail in future site specific reports, indicating how the impact from store construction and operation might affect adjacent offsite developments. We would expect to see this through a site specific Environmental Impact Assessment (EIA) for the selected interim storage site and ILW Store.

#### 4.0 Transport, Regulation and Planning Issues

##### **Question 3: Do you have any views on transport, regulation or planning issues?**

- 4.1 Transport: The Environment Agency does not regulate the transport of radioactive waste. In the case of SDP, ILW transportation will be regulated by the Defence Nuclear Safety Regulator (DNSR). We have a regulatory interest in ensuring that the ILW is not adversely affected during prolonged storage to an extent that would impact on its final disposal. We will work closely with DNSR in our role in permitting the transfer of radioactive wastes between sites. We will continue to work with the Ministry of Defence as it develops options for the type of container that will be used to transport and potentially store the reactor pressure vessels. The selected container needs to enable safe storage until the wastes can be consigned to a final repository for disposal. Storage arrangements must not compromise disposal of these wastes.
- 4.2 Regulation: We will continue to engage with the Ministry of Defence through our established regulatory interface forum and with site operators through our operational sites regulation programme. We expect to engage with a nominated site operator when the Ministry of Defence makes a decision to select a specific site, if this is in England. Our main regulatory focus will be on the management of the ILW and permitting its transfer, storage and final disposal. We will work closely with the Office for Nuclear Regulation (ONR), using the joint guidance published for “The Management of Higher Activity Wastes on Nuclear Licensed Sites” to ensure that appropriate safety and environmental protection measures are used at all stages of the management of this ILW.

- 4.3 We regulate the transfer of radioactive wastes through permits we issue under the Environmental Permitting Regulations 2010. We will continue our regulatory engagement with the Ministry of Defence and the initial dismantling site operators, i.e. Devonport Royal Dockyard Limited (DRDL) in England to enable transfers from the Devonport dismantling sites to an interim storage site. We will work closely with the Scottish Environment Protection Agency (SEPA) on radioactive waste management in relation to any transfers of waste to England from Scottish sites. Together with ONR and SEPA we have indicated that we expect the Ministry of Defence to develop and own a Radioactive Waste Management Case (RWMC) detailing the steps and processes that control the management of all phases of this waste management process. We also expect the Ministry of Defence to engage with site operators in demonstrating the use and application of the RWMC.
- 4.4 Planning: Local Planning Authorities have an obligation to consult with the Environment Agency on relevant planning applications. We already have good relations with planning authorities around the four candidate sites in England and will use our normal processes to provide input to the planning arrangements for an ILW store.

## 5.0 Site specific issues to consider

### **Question 4: What do you think are the main issues that we need to consider with each site?**

- 5.1 Our main comments relate to minimising the environmental impact during construction and operation of an interim ILW store. The Ministry of Defence and the site operator need to:
- Address the potential risk of flooding to offsite property prior to the start of any construction. Specifically, the Ministry of Defence and the Atomic Weapons Establishment (AWE plc) would need to address this at AWE Burghfield as this site is most at risk from flooding (as occurred in 2007) and parts of the site lie in Flood Zone 3a. AWE is developing a robust flood alleviation scheme and additional mitigation including the purchase of land for a sacrificial management scheme to avoid flooding of the site. We have a particular interest in this and wish to be kept informed as it is delivered
  - Minimise conventional environmental impact, such as noise and dust, during construction
  - Manage potential historic radiological and/or conventional contaminants during pre-construction activity
  - Manage waste during construction and operation

5.2 The Ministry of Defence has undertaken detailed assessment of the waste form – solid metallic material – and has concluded that there will be no aqueous or gaseous radioactive waste arising from storage. We agree with the Ministry of Defence’s initial assessments that there should be no radiological discharges resulting from the normal operation of an interim ILW store. We will make our own assessment when a specific site and storage option, including storage container, are known.

## 6.0 Potential issues affecting local communities

### **Question 5: Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

6.1 Our comments are focused around our areas of regulatory vices – see response to Q4. We stand ready to explain to local communities how we exercise our independent regulatory role in ensuring protection of people and the environment.

## 7.0 Ministry of Defence approach to deciding between shortlisted storage sites

### **Question 6: What are your views on our approach to deciding between the shortlisted storage sites?**

7.1 We have been engaged with the Ministry of Defence throughout the process of shortlisting potential storage sites. In our view the list of potential sites is realistic for the next step, i.e. detailed examination. In particular, the project team has taken account of our earlier comments on excluding clearly inappropriate sites from the process and therefore enabling a focus on assessment of realistic candidate sites. While this approach has taken time, it has avoided some nugatory assessment work, for example at sites where ILW storage would impact on decommissioning plans or make current operations more complex.

## 8.0 Stages following the consultation

### **Question 7: Do you have any comments on the stages that will follow this consultation?**

8.1 The Ministry of Defence has indicated that a decision on selection of a specific site will be announced in mid-2016. We will continue to engage with the SDP through our normal regulatory programme and in particular on any permitting and planning detail that arises through the selection process. It is important that the Ministry of Defence continues to devote the necessary resources and funding to take forward and deliver this important programme for managing its legacy wastes.

## 9.0 Conduct of the consultation

### **Question 8: Do you have any comments about the conduct of this consultation or the information provided?**

- 9.1 We have been engaged with the Ministry of Defence and regulatory partners since the inception of the Submarine Dismantling Project. In our regulatory role we have been consulted by the Ministry of Defence on their approach to all stages of the SDP process to date and in particular on the regulatory implications of their proposals. During our engagement we have been party to both proposals and to the mechanism by which the Ministry of Defence would consult with stakeholders. We have attended several workshops where we have been able to address questions from the public, locally elected representatives and Non-Government Organisations concerning our role as a regulator. Attendance at these workshops has been of considerable benefit to us in communicating to others how we regulate the submarine programme. The Ministry of Defence has provided a detailed consultation pack of information and this has been helpful in enabling us to respond to this consultation.

### **Question 9: Are there any other comments you would like to make?**

- 9.2 We have no further comments.

### **Further information**

Background or further information can be obtained from David Griffiths, Team Leader Nuclear Regulation Group, Environment Agency by e-mail at [d.griffiths@environment-agency.gov.uk](mailto:d.griffiths@environment-agency.gov.uk)

**February 2015**

Subject: SDP Interim Storage of ILW

Follow Up Flag: Follow up  
Flag Status: Flagged

Dear Sirs - The Parish Council has considered the proposals outlined in the consultation document and at its meeting on 14th January the following minute was recorded which provides a response to that consultation:

"Gosforth Parish Council is constituted from members with wide and diverse backgrounds ranging from leaders of local businesses, professional engineers and retired members with many years of experience in varying fields. This diversity of knowledge and experience allows us to take a wide ranging and pragmatic view on proposals. It is the Parish Council's opinion that Sellafield should not become the default option for storage of nuclear waste and that no further waste should be brought on to the site unless there is a clear socio-economic benefit for the local community. The consultation documents suggest that these benefits are likely to be minimal. Until there is a clear agreement to provide benefits to the local community, the Parish Council cannot support storage of the submarine dismantling project waste on the Sellafield site."

Yours  
Dave Polhill  
Clerk - Gosforth PC

26 FEB 2015

Freepost RSKJ-KRAH-YZRJ  
c/o Instinctif Partners Ltd.  
4<sup>th</sup> Floor Dukesbridge Chambers  
1 Duke Street  
Reading  
RG1 4SA

19 02 15

Dear Sir/Madam

### **Submarine Dismantling Project Public Consultation Response**

Guide Dogs for the Blind Association (GDBA) is a national and international British charity providing help to thousands of blind and partially sighted people across the UK through the provision of guide dogs, mobility and other rehabilitation services. They also campaign for the rights of those with visual impairments and invest in eye disease research. The headquarters and registered office of the charity is located at Hillfields in Burghfield Common approximately 1km from AWE Burghfield.

DNS Planning & Design is instructed by GDBA to investigate the implications of the storing of Intermediate Level radioactive waste from Royal Navy at AWE Burghfield and AWE Aldermarston on their real estate at Hillfields.

Consequently we would like to raise strong objection to the proposed nuclear storage facility for the following reasons:

- We have major concerns about health and safety at AWE Burghfield and AWE Aldermarston and the implications for the local population. The south east of England and the locality of these sites is a highly populated areas. Burghfield primary school is located within 750m from AWE Burghfield.

- The two main dismantling locations for the nuclear submarines is Devonport (200 miles) and Rosyth (430 miles). These are considerable from distances from AWE Burghfield and AWE Aldermarston. Consequently we have major concerns about the transportation of the nuclear waste along motorways and major transport routes as well as through the local towns and villages including Reading, Theale and Burghfield.
- There is already a waste disposal facility at Sellafield where the submarines were built and this could be accessed by sea rather than transporting the waste along the motorway network. The other two shortlisted sites are also close to the coast and accessible by sea.
- Hillfields lies within AWE's Inner Planning Consultation Zone (IPCZ) as set out in West Berkshire District Council's Planning Policy CS8 (Nuclear Installations - AWE Aldermarston and Burghfield). This requires early consultation with the Council and Office for Nuclear Regulation (ONR) on all types of new development when seeking planning permission. The siting of the new nuclear waste facility at AWE Burghfield has the potential to create further restrictions on new development and this will prevent GDBA's future development potential for expansion of the Hillfields complex.
- The Council are also looking to allocate a number of sites for residential development within IPCZ to meet the requirements of their recently published Housing Site Allocations DPD Preferred Options Report for the East Kennet Valley Spatial Area. The siting of the proposed nuclear waste facility at AWE Burghfield has the potential to prevent the delivery of much needed housing in Burghfield.

For these reasons we conclude that the siting of the proposed nuclear waste facility at AWE Burghfield or AWE Aldermarston is highly inappropriate and the facility should be sited elsewhere.

Yours sincerely

*Helen Donnelly*

Environment Director

**SDP Consultation Response**  
**Joan McAlpine**  
**MSP for South of Scotland Region**

**Introduction**

I would like to thank you for the opportunity to respond to this consultation. Given my role as MSP for the south of Scotland region with a particular focus on Dumfriesshire, the comments made below relate specifically to the proposed site at Chapelcross.

**National Policy**

The first point I would like to make relates to paragraph 41 from the consultation document. The paragraph outlines that defence is a UK Government responsibility and that that Scottish Government policy long term management of radioactive waste is superseded by UK government policy regardless of where the RPVs arise from. This seems to be in contradiction to the respect agenda that has been talked about post-referendum.

Was the Chapelcross site to be chosen, this creates the risk of setting a precedent for accepting future nuclear waste, contradictory to Scotland's national policy.

**Socio-Economic Development**

However, most importantly, this would put at risk current plans for a more positive sustainable future to be built on the former nuclear site. Given the lack of socio-economic benefits offered, it is pivotal not to put at risk economic development in the area. Under the Chapelcross Development Framework, Scottish Enterprise has established specific targets for the future economic development at Chapelcross under a variety of mixed uses. These have emerged from local and national policy objectives to include:

- Distribution
- Haulage
- Renewables/Energy
- Incubator
- General Industrial

Recent discussions with Scottish Enterprise have focussed on hopes to develop the site into an energy park with a renewable lead. It is a grave concern that accepting nuclear waste on the site would jeopardise such opportunities.

The Framework also focuses on building on the existing skills base in the area, specifically energy, engineering, construction and food processing. Tourism and food processing in particular are huge economic drivers in the area. The new Annandale Distillery is case in point, and a new nuclear waste storage facility seems entirely incompatible with such a venture – the perception of being close to such facilities would undoubtedly jeopardise the success of such a business. It would also create problems for the marketability of sites around the Chapelcross site for future development. This is a huge backward step.

## **Transportation**

It has been convincingly argued, not least by the Nuclear Information Service, that transporting radioactive material is one of the nuclear industry's riskiest activities. Indeed, it was reported in 2012 that there was an alarming increase in accidents related to the transportation of radioactive materials – 38 in 2011 compared to 30 in 2010.

This is very concerning – particularly given that the local transport routes include a series of minor roads that are entirely unsuitable for such transportation and creating risks to community safety.

## **Conclusion**

Given my views outlined above I would like to record my serious opposition to the storage of nuclear waste at the Chapelcross site.

I am happy for these comments to be published.

## **Contact Details:**

Unit 7, the Loreburne Centre, High Street, Dumfries, DG1 2BD

[Joan.McAlpine.msp@scottish.parliament.uk](mailto:Joan.McAlpine.msp@scottish.parliament.uk)

01387 255334

20 February 2015

**Pelham House**  
Pelham Drive,  
Calder Bridge, Seascale,  
Cumbria, CA20 1DB  
**Tel:** +44 (0)1946 770200  
**Web:** www.llwrsite.com

Submarine Dismantling Project  
FREEPOST RSKJ-KRAH-YZRJ  
c/o Instinctif Partners Ltd,  
4th Floor, Dukesbridge Chambers,  
1 Duke Street,  
Reading RG1 4SA.

Dear Sir/Madam,

**Submarine Dismantling Project - Consultation Document on the Site for Interim Storage of Intermediate Level Radioactive Waste.**

I am writing on behalf of LLW Repository Ltd (LLWR) in response to the above consultation. Our organisation manages and operates the UK National Low Level Waste Repository in West Cumbria on behalf of the Nuclear Decommissioning Authority.

We are grateful for the opportunity to comment on the plans for siting of an interim store and we hope the responses below are useful. We have also taken the opportunity to represent our views on future developments that we believe will be beneficial to the Submarine Dismantling Project.

***Q1. Do you have any comments or views on the proposed RPV storage arrangements?***

- A. The segregation of waste into separate streams, each aligned with waste disposal, treatment and recycling capability is the appropriate solution for SDP and we endorse this approach.
- However, the strategy as currently described proposes the construction, operation, maintenance and surveillance of a store for an undetermined period, possibly up to seventy years. At the end of this period there is no guarantee that the items stored therein will be suitable for deep geological disposal without further repacking, further transport to a treatment facility (for size reduction) and repacking again into a final disposal configuration prior to more transport to the Geological Disposal Facility. These activities will, in all likelihood, require construction of at least one more major nuclear facility (as we are unaware of plans for any national size reduction facility, let alone one with the capability to handle components the size of an RPV) and increase the exposure of a future workforce to ionising radiation.
- Whilst all this represents a technically valid solution, we suggest MOD consider pursuing a parallel track (at least in the short to medium term) to understand if the simpler option of near-surface disposal could be applied to this project.
- B. We understand that the strategy must be predicated on MOD's assessment of current UK radioactive waste disposal capabilities but we venture to suggest that these capabilities will change during the early stages of the SDP. We consider it likely that other disposal options will present themselves in the next decade or so, (potentially within a timescale compatible with the SDP schedule). These will include near-surface

disposal capability at new or existing nuclear sites. In our view, the nature of the waste arising from SDP should be entirely compatible with such facilities, so long as their design, specification and licensing stages take SDP's requirements into consideration. We note that the experience of other nuclear Navies around the world provides ample evidence that near-surface disposal of submarine propulsion system components, including RPVs, is practicable.

Utilising such new developments in near-surface disposal in the UK would remove the two key uncertainties from the current programme, namely the duration of the interim storage period and the potential requirement for size reduction of the pressure vessels themselves.

It is therefore our view that while the proposed RPV Storage Arrangement is a valid solution, there is the opportunity to deliver a faster, simpler option through near-surface disposal that would result in better value for money for the UK taxpayer and remove the burden on future generations to manage this legacy.

- C. The challenge of size reduction is a major one. We would suggest that this activity is by some margin the biggest technical challenge facing the project over its lifecycle. Good evidence to underpin the costs and risks associated with this type of work is readily available from Sellafield Ltd as a result of both their decommissioning programme and experience in size reducing equipment used in the High Level Waste Vitrification Complex. We suggest that the project team make full use of Sellafield's experience in this area when deriving the project lifecycle cost.
- D. We would suggest that the additional allowance in total footprint of the storage facility for the repacking of the RPVs appears to be optimistic if shielded remote handling and installed (rather than mobile) nuclear-standard lifting capability is envisaged. Furthermore, decommissioning experience from the Magnox and Sellafield sites shows that engineering substantiation of aged structures to enable these types of lifting and handling operations can be problematic. We suggest that MOD considers deletion of the additional footprint and assumes a dedicated repack building will be required in order to meet the prevailing construction and engineering standards at the time the capability to repack is needed.
- E. We note that the volume of radioactive wastes that will be generated by SDP over and above the RPVs themselves is unquantified in the strategy. While we understand that this level of detail might not be appropriate at this stage, it would be beneficial if total predicted waste arisings could be derived for incorporation into the project lifecycle cost.
- F. In the section "Choosing a Storage Site" para 18 it is stated that "the MOD will consider an alternative, such as sharing a new or existing store or the use of two sites, if evidence emerges which shows it to be a better option." It is unclear whether this statement is limited in its interpretation to the five sites under consideration. If this is the case we would strongly recommend that MOD does not limit its options in this way.

**Q2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?**

- A. We note that the scope of the SEA does not include the impact of future activities to condition the RPVs for deep geological disposal. We agree that it is correct to omit this from the SEA since size reduction of these heavy, thick-walled, radioactive vessels will be a significant undertaking requiring SEA in its own right. However, we would wish

MOD to ensure that repacking (twice) and size reduction is properly accounted for in their assessment of the full lifecycle cost of the project.

- B. Given the omission of the size reduction facility and in the context of our responses to Q1 we would contend that the environmental impact of the SDP on an existing or future near surface disposal facility would be readily managed through existing development and permitting processes and such impacts may well be less than those that could be reasonably expected for the entire SDP project (including size reduction) as defined in the consultation.

**Q3. Do you have any comments or views on transport, regulation or planning issues?**

- A. We agree that MOD should undertake the transportation of the RPVs. This will be a challenging task, but we would be willing to share our own experience in this area. LLWR has worked closely with its partners to facilitate the transport of larger, more complex radioactive items without issue. We agree that road transport offers the most flexible solution, but MOD should not rule out multi-modal options.
- B. Environmental Regulation - In recent years, UK environmental regulators have published their "Near-surface Disposal Facilities on Land for Solid Radioactive Wastes: Guidance on Requirements for Authorisation" LLWR applied this guidance when preparing its application for an Environmental Permit for its site in West Cumbria. We contend that the environmental regulators expectations with regard to near surface disposal are now clear and unambiguous and greatly assist the nuclear industry in developing new near-surface options.
- C. Nuclear Regulation - our comments against Q1 notwithstanding, we do not anticipate that there would be significant additional burden on a competent licensee if an existing nuclear licensed site were to be used for interim storage. We would however point out that if operation, maintenance and surveillance of the SDP Interim storage facility are deemed a licensable activity under NIA65, then the impact on delicensing, interim and final end states for the chosen site must be considered. There is insufficient information in the consultation to form a conclusion, but we suspect that "hosting" the SDP Storage facility for many decades could result in delay to planned delicensing and final site closure for some of the shortlisted sites. The impact of an SDP Storage Facility on planned land use is also a relevant consideration.
- D. As holders of a Nuclear Site Licence LLWR understands the vital importance of retaining a qualified workforce to meet the obligations of a licensee. The cost of providing this capability at a host site should not be excluded from MoD's considerations on full lifecycle project cost and value for money.
- E. Security Regulation - we agree that storage of containerised SDP waste represents a low risk from a security perspective. However we would contend that moving waste to final disposal in a near surface or deep geological repository as soon as practicable will always be preferable to Security regulators and the public.

**Q4. What do you think are the main issues that we need to consider with each site?**

- A. Our responses on Q1 notwithstanding, there seem to be few discriminators between the sites from a technical and logistical point of view. In the overall picture of managing the UK's radioactive waste legacy, RPVs in isolation represent a relatively low volume

of material with demanding but infrequent transport requirements. Wider considerations such as impact on the chosen sites interim and final end states, land use and community acceptance would seem to be the more important factors.

**Q5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

- A. Our response on Q1 notwithstanding, in our experience the affected community will be interested in;
1. Detriment to the amenity of the local area. (Disruption through traffic, road closures, noise, dust, vibration and visual intrusion etc.).
  2. Implementation (or not) of a Community Benefit Fund. (Direct payments to local government to compensate the host community will be anticipated, along with socio-economic benefit arising through construction and operating phases. There may well be an expectation that Community Benefit Funding will endure throughout the period of interim storage).
  3. Safety, Security and Environmental Impact. (The extent of these concerns is difficult to predict and will vary over time in accordance with the level of "trust" between the community and the operator and the extent to which the nuclear industry and its supply chain is already present).

**Q6. What are your views on our approach to deciding between the shortlisted storage sites?**

- A. The Assessment Approach and Investment Appraisal seem robust and appropriate. The treatment of risk and uncertainty in the decision making process will be crucial.

**Q7. Do you have any comments on the stages that will follow this consultation?**

- A. LLWR would welcome the opportunity to engage directly with the SDP Team post consultation to expand on our submission. We would seek to include colleagues from RWM Ltd in this discussion such that a more 'holistic' view of the potential developments in near surface disposal can be provided to MOD by the two organisations closest to these issues.

**Q8. Do you have any comments about the conduct of this consultation or the information provided?**

- A. The documentation and supporting information presented by the SDP team are very well presented, their use of language and level of detail provide an accessible, transparent and well structured representation of the project at its current stage.
- B. Several members of the LLWR team attended separate 'Road Show' events in different locations. Feedback from our team was consistent - the quality of both the materials and the staff representing the project were high. SDP staff were knowledgeable and willing to engage on any aspect of the project.

---

**Q9. Are there any other comments you would like to make?**

- A. As the consultation document reminds us, 'UK Government policy is that decommissioning and disposal operations should be started as soon as practicable.' We are supportive of this policy and very conscious that although there are differences in the means by which defence and civil nuclear liabilities are managed, we must work with MoD to achieve the most cost effective solution for the UK Taxpayer.
  
- B. We consider that SDP represents a tremendous opportunity for DECC (through the Nuclear Decommissioning Authority) and the Ministry of Defence to realise the benefits of inter-departmental collaboration and we look forward to the outcome of this important consultation.

Once again we would like to thank the SDP team for the opportunity to provide these comments, please do not hesitate to contact me directly if you have any questions or require clarification on our response.

Yours sincerely

Martin Walkingshaw  
Head of Waste Management Services  
Executive Director

For and on behalf of;

LLW Repository Limited

John Davis  
Programme Manager Submarine Dismantling Project  
c/o Instinctif Partners Ltd  
4th Floor, Dukesbridge  
Chambers  
1 Duke Street  
Reading, RG1 4SA.

**Email:** [sdp@instinctif.com](mailto:sdp@instinctif.com)

13 February 2015

Dear John,

**RE: Defence Equipment and Support Submarine Dismantling Project Interim Intermediate Level Waste Storage Site Selection: Strategic Environmental Assessment Environmental Report November 2014**

Thank you for giving Natural Resources Wales the opportunity to comment on the Environment Report for the Defence Equipment and Support Submarine Dismantling Project, interim Intermediate Level Waste Storage Site Selection Strategic Environmental Assessment (SEA). Our comments are made in the context of our responsibilities under the Environmental Assessment of Plans and Programmes Regulations 2004 and as advisers to Welsh Government on the natural heritage and resources of Wales and its coastal waters.

Our purpose is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably used and sustainably enhanced, now and in the future.

NRW has reviewed the Strategic Environmental Assessment (SEA) Environmental Report and supporting consultation documentation. We acknowledge that none of the preferred site options proposed within the consultation are in the boundary of Wales, however we have considered it with respect to potential impacts on the environment of Wales.

As noted in our response to the previous MOD Scoping Report for ILW Storage Site Selection (our letter dated 10/3/2014), that out of the 4 proposed options for a site in England to store the ILW, the one of the most interest to us is that of the existing Capenhurst site in Cheshire which is close to the border of Wales.

We note and accept, based on the information provided from the MOD's initial assessments, that there are not anticipated to be any significant effects likely to result during construction, operation and decommissioning of the interim ILW storage at any of the candidate sites. Moreover from the information provided, there would not be any radiological discharges from the SDP interim ILW

storage site that would require amendment to the existing environmental permits or authorisations on any of the proposed sites.

We recognise that it would be our colleagues from the Environment Agency, the Office for Nuclear Regulation, the Defence Nuclear Safety Regulator (DNSR) and Local Planning Authorities whose remit and vires would lie with a proposed ILW store at Capenhurst. However were the Capenhurst site selected for the storage of the ILW, given its proximity to the River Dee and Bala Lake Special Area of Conservation (SAC) and The Dee Estuary SAC, Special Protection Area (SPA) and Ramsar Site, we would welcome the opportunity for an increased engagement programme with the Ministry of Defence and our regulatory partners going forward to understand and determine the potential impacts (if any) on the Welsh Environment from any proposed activities in England associated with the project.

This would include further engagement on habitat assessments particularly for those receptors detailed above and, where applicable, see any future site specific reports including how the impact from the construction and operation of the facility might affect the environment in Wales. We would like to seek assurance that a proposed ILW site at Capenhurst would be managed appropriately and that all the necessary regulatory requirements and controls were implemented.

We note that the MOD has indicated that a decision on selection of a specific site will be announced in mid 2016. As such we look forward to continuing to work with the Ministry of Defence and our regulatory partners on the continued development of this programme and its assessments and thank the Ministry for inviting NRW to comment on its consultation.

Should you have any queries regarding these comments, please do not hesitate to contact Ruth Tipping in the first instance at [Ruth.Tipping@cyfoethnaturiolcymru.gov.uk](mailto:Ruth.Tipping@cyfoethnaturiolcymru.gov.uk). Please note we now have a strategic assessment mailbox:- [strategic.assessment@cyfoethnaturiolcymru.gov.uk](mailto:strategic.assessment@cyfoethnaturiolcymru.gov.uk) and would encourage all SEA and plan HRA consultations to come in to NRW via this route.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rhian Jardine', with a horizontal line underneath.

Rhian Jardine  
Head of Sustainable Communities

# Nuclear Free Local Authorities Secretariat

c/o Nuclear Policy Unit, City Policy Team, Level 5, Town Hall Extension, Manchester, M60 2LA  
Chair: Councillor Mark Hackett Secretary: Sean Morris  
Tel: 0161 234 3244 Fax: 0161 234 274 7397  
Email: [s.morris4@manchester.gov.uk](mailto:s.morris4@manchester.gov.uk)  
Website: <http://www.nuclearpolicy.info>



Submarine Dismantling Project,  
FREEPOST RSKJ-KRAH-YZRJ,  
c/o Instinctif Partners Ltd,  
4th Floor, Dukesbridge Chambers,  
1 Duke Street,  
Reading RG1 4SA.

16<sup>th</sup> February 2015

Emailed to: [sdp@instinctif.com](mailto:sdp@instinctif.com)

Dear MoD Submarine Dismantling Team,

## Ministry of Defence Public Consultation on Choosing a Site for the Interim Storage of Intermediate Level Radioactive Waste from Dismantled Nuclear Submarines

I attach with this letter the official submission response of the UK & Ireland Nuclear Free Local Authorities (NFLA) to the Ministry of Defence (MoD) public consultation on „Choosing a Site for the Interim Storage of Intermediate Level Radioactive Waste from Dismantled Nuclear Submarines“. The NFLA is content for its submission to be made public on the MoD website, and has placed a model response of this submission on its own website.

For your information, NFLA is a local authority group made up of Councils from England, Scotland, Wales, Northern Ireland and the Republic of Ireland. It raises legitimate concerns over all aspects of nuclear policy in order to assist local government in meeting its commitment to sustainable development, environmental protection and public safety. Further details on its remit can be found at its website <http://www.nuclearpolicy.info> or by contacting the NFLA Secretariat using the details at the top of this letter.

### 1. Background to NFLA response

In 2011 the Ministry of Defence (MoD) consulted on its Submarine Dismantling Project (SDP). (1) This consultation considered options for dealing with the waste inside 17 of the Royal Navy's out-of-service nuclear powered submarines which are afloat in storage – ten at Devonport and seven at Rosyth dockyards – and a further 10 submarines still in service, making a total of 27. The new Astute Class submarines currently being brought into service and the next planned class of submarines (known as Successor) were not within the scope of the consultation.

NFLA notes that three possible options for removing radioactive waste from the submarines were proposed:

- Separating and storing the whole reactor compartment, which weighs around 700 tonnes.
- Remove and store the Reactor Pressure Vessel (RPV), which weighs around 50-80 tonnes. Any remaining ILW (in pipework connected to the RPV for example) would then be packaged in a shielded container that is suitable for transport and storage;
- The RPV and other radioactive waste would be removed but then immediately size-reduced and packaged into boxes for storage.

In its response to the 2011 Consultation the NFLA argued that, although the MoD claimed both worker doses and planned discharges of radioactivity were predicted to “*remain within currently permitted limits*”, it was clear that the two RPV Removal options failed to meet the ALARA (As Low as Reasonably Achievable) principle. The fact that discharges of radioactivity into the environment are expected to occur at all when there is a technique available which involves minimal discharges into the environment – namely the Reactor Compartment (RC) Separation Option – means that

RPV removal options should be ruled out on the grounds that they are not the Best Available Technique and do not apply the precautionary principle.

The NFLA concluded that by applying a series of environmental principles (see box below) to the problem of what to do with decommissioned submarines the option of storing the intact reactor compartments above ground at the sites where the submarines are currently either stored afloat or defueled appeared to be the best option.

### **Environmental Principles**

The NFLA Steering Committee agreed a set of clear environmental principles which should be used for the management of nuclear waste in October 2004 at its Annual General Meeting in Hull. These are:

- **The idea that radioactive waste can be "disposed" or be rejected in favour of radioactive waste management;**
- **Any process or activity that involves new or additional radioactive discharges into the environment be opposed, as this is potentially harmful to the human and natural environment;**
- **The policy of 'dilute and disperse' as a form of radioactive waste management (i.e. discharges into the sea or atmosphere) be rejected in favour of a policy of 'concentrate and contain' (i.e. store safely on-site);**
- **The principle of waste minimisation be supported;**
- **The unnecessary transport of radioactive and other hazardous wastes be opposed;**
- **Wastes should ideally be managed on-site where produced (or as near as possible to the site) in a facility that allows monitoring and retrieval of the wastes;**

When estimated radiation dose to workers were later revealed to be between 0.94 and 1.0 millisieverts per year (mSv/yr) for the two RPV options compared with 0.18mSv/yr for the Reactor Compartment (RC) Separation option, this confirmed the NFLA view. (2)

However, the MoD took a different view and announced its decision to go ahead with its favoured option of removing the RPVs and storing them intact prior to disposal in March 2013. (3) The RPV removal and storage option may still require the 50 – 80 tonne pressure vessel to be cut up into smaller pieces for packaging and disposal eventually, but waiting longer to undertake this process allows for some of the radioactivity to decay before size reduction begins.

## **2. The Submarine Waste Storage Consultation**

NFLA notes that decisions about where and how the 27 submarines covered by this exercise should be dismantled have now been made. Initial dismantling will take place at Devonport (where 12 submarines are already stored afloat) and Rosyth (where 7 are stored afloat). The Reactor Pressure Vessels (RPVs) will be removed whole from the submarines and dispatched to an interim store. NFLA will continue to co-operate with Fife Council as this part of the process moves forward, to ensure the Council and the local community are fully engaged with initial dismantling.

NFLA notes that the first submarine to be dismantled to demonstrate the process will be HMS Swiftsure at Rosyth. NFLA understands removal of the Low-level waste is expected to begin in 2016 – but that nothing will happen to the RPV until planning permission and regulatory authorisations have been received for the store. So Swiftsure will probably be returned to storage afloat for a time after up to 2 years has been spent removing LLW. NFLA will liaise with Fife Council throughout this process.

The current consultation is about choosing a site for the interim storage of the RPVs. Five sites have been shortlisted – Aldermaston, Burghfield, Capenhurst, Sellafield and Chapelcross.

The interim storage building would be a simple steel-framed construction to provide a weatherproof, secure store, designed to last 100 years. The MoD says there is no need to provide extra shielding. The MoD hopes to be able to place the first RPV in the store around 2022. According to the Strategic Environmental Assessment no significant impacts have been identified around the 5 sites.

NFLA notes and welcomes that the finding of this consultation will be published later in 2015 in a post-consultation report. NFLA also notes that the aim is to build only one ILW store.

### 3. Core areas of concern for the NFLA

Given that the MoD has now decided to go-ahead with the removal and storage of the RPVs there are three main areas of concern for the Nuclear Free Local Authorities.

- (1) Firstly, as with civil nuclear waste, NFLA recognise that the operation of nuclear submarines in the past has generated nuclear waste which is going to have to be dealt with whether we like it or not. However, the building and operation of new nuclear submarines which will generate new nuclear waste which is optional raises completely different political and ethical issues. ***The NFLA view is that the management and so-called „disposal“ of nuclear waste is fraught with so many difficulties and uncertainties that it is unethical to proceed with the generation of new waste.***
- (2) Secondly, the programme for the interim storage of RPVs and also the generation of new waste by new Astute Class submarines currently being brought into service and the next planned class of submarines (known as Successor) depends on the UK Government's search for a Geological Disposal Site and construction of a Geological Disposal Facility proceeding according to the current schedule. The predicted lifespan of the interim store also depends on the Geological Disposal Facility (GDF) being able to accept MoD radioactive waste relatively early on in its predicted life. ***In the NFLA's view, the MoD's programme makes assumptions about the capacity of a GDF which may prove to be too optimistic.***
- (3) In a Scottish context the fact that Scotland's Environment Minister, Richard Lochhead, has written to the UK's Under Secretary for Defence, Philip Dunne, saying that waste from dismantling submarines "*should not be stored in Scotland*" ***raises to the NFLA important issues of democratic accountability.*** (4). The MoD view seems to be that this should not prevent Chapelcross being proposed as the site for a store because the Scottish Government can only refuse planning permission on the basis of clear planning grounds. The same would apply if a large number of members of the public objected. Not wanting nuclear waste stored near your property is not grounds under planning law to object. For a large number of objectors to influence the process they would all need different planning grounds for the objection. If they all used the same planning ground they would carry no more weight than a single objection.

### 4. New Nuclear Submarines

The MoD currently assumes that a GDF will be available by the time future submarines (Astute Class and Successor Class) are decommissioned. Should this not be the case the MoD would have a number of options including storage afloat and the use of any spare capacity in the store.

**It is the NFLA's view that the MoD should rule out building any stores with spare capacity and any planning permission granted for a store should be contingent on that store only being used for storage of RPVs from the initial 27 decommissioned submarines.**

The Environment Agency (EA) has set a limit on the risk that may be caused by the burial of radioactive wastes of  $10^{-6}$  (i.e. one in a million) (5) This means that a GDF with spent fuel from more than 12 new reactors, as well as legacy waste, would exceed the risk targets set by the EA. This could mean that by the time the RPVs from newer submarines (beyond the initial 27) are looking for a space the first GDF could have run out of allocated space. (6)

## 5. Lifespan of the Store

The MoD assumes that the RPVs will be removed from the store and taken to a GDF sometime after 2040. It says the store will be designed to last at least 100 years (i.e. until around 2120)

The Government says all legacy wastes may not be emplaced until 90 years after the GDF is expected to be available. In other words this would currently be 2130. (7) However, if there are delays in finding a site for a GDF, the construction programme or commissioning the facility, this date could be further delayed. Should the GDF programme be delayed, cancelled or suffer problems of any description, or should the emplacement of the RPVs be programmed to take place at the end of the emplacement of legacy waste, the stores could easily be more than 100 years old before the RPVs are removed.

Given the problems with waste management at Sellafield where waste is said to pose an **“intolerable risk”** (8), and where there is: **“...an extraordinary accumulation of hazardous waste, much of it stored in outdated nuclear facilities”** (9) it is quite likely that emplacing RPVs in a GDF will not be the main priority for future waste management agencies.

***It is the NFLA view that stores should be designed to last at least 150 years or more.***

## 6. Democratic Accountability

If there is one thing that the history of nuclear waste management has shown is that it has to be done with the consent of the local population. One issue which is likely to influence people living near proposed facilities is whether or not the RPV store will lengthen the life of the site as a nuclear waste site.

As noted above, RPVs could be stored, under certain circumstances, on the chosen site until 2130 or later.

Final Site Clearance of the proposed sites is currently expected to be:

Chapelcross - 2095

Sellafield - 2120

Capenhurst - 2115

Burghfield – no significant ILW stored there

Aldermaston – no plans for final site clearance.

***It is the NFLA view that Chapelcross should be ruled out on the grounds that it does not have the support of the Scottish Government and that RPV storage is likely to delay final site clearance.***

## 7. NFLA Response to Individual Consultation Questions

### a. Do you have any comments or views on the proposed RPV storage arrangements?

See areas of concern above.

### b. Have you any comments on the Strategic Environmental Assessment or other information we have presented on environmental issues?

Although no discharges (airborne or liquid) are expected from the store, the MoD says it would still require a discharge authorisation. The application for such an authorisation would have to make reference to plans being made for final „disposal“. This should include contingencies for delay in the GDF programme.

According to the MoD, if the application means there is no big change to the radioactive discharges from the site in question then the relevant Environment Agency would not have to run a public consultation. NFLA believes this would be a mistake. The Environmental Agencies should be encouraged to run a public consultation exercise.

The MoD says there should be no need to monitor for radiation outside the store. Nevertheless the NFLA view is that a programme of monitoring should be undertaken.

**c. Do you have any comments or views on transport, regulation or planning issues?**

There are 23 submarines with RPVs which will weigh around 50 tonnes and 4 (Vanguard Class) which will weigh around 80 tonnes. It is understood that it may be possible with at least the 23 smaller RPVs to emplace them in a GDF without any further size reduction.

Submarines will be laid up for at least 20 years before any RPV removal takes place. An RPV is basically a lump of activated metal – so not nearly as dangerous as something like spent fuel, where a nuclear fission reaction has taken place. It is understood that most of the radioactivity in an RPV is on the inner walls. The dose rate on the outside is driven by Cobalt-60 which has a half-life of only 5.27 years. So after a period of storage this will have reduced considerably. Regulators should ensure that there are procedures in place to avoid any surface contamination problems.

The plan is to package the RPVs in an Industrial Package Type 2 (IP2) or possibly a Type B container (the standard used for spent fuel transport). Once in an IP2 the weight would increase to 90 tonnes (for 23 subs) and 135 tonnes (for 4 subs). These packages would be too wide for rail, and although most of the proposed storage sites are on the coast - none is near to a port, so sea transport would be difficult. Transport, therefore, would be by road – similar to the 150,000 large loads transported on UK roads every year. RPVs would be transported at about the rate of one per year.

In the NFLA's view, road movements should be carried out in direct and close consultation with the affected local authorities. Given the nature of the RPVs there should be no question of secrecy.

Planning permission should be granted for any proposed storage facility on the basis that it will only store 27 RPV packages and will not be used for other nuclear waste.

**d. What do you think are the main issues that we need to consider with each site?**

**e. Once a site is chosen what do you think will be the most important issues for the potentially affected community?**

The level of opposition and support from the local community and elected representatives should be an important consideration. There also needs to be recognition given that nuclear waste is an issue which creates a lot of concern amongst ordinary members of the public. Every effort should be made to make sure the local community does not feel that it is having this imposed on them. Where there are opportunities for further consultation, further reassurance through extra radiation monitoring beyond what is required or further safety procedures, these should be taken.

Whether or not there is a danger of extending the life of a nuclear site beyond the currently assumed date for final clearance.

Given that there will be 27 very large loads transported to the store and eventually transported away from the store; transport is going to be an important consideration.

With an interim store expected to be in place for 100 years, and in the view of the NFLA to be at least 150 years, the MoD needs to consider climate change scenarios and the flooding risk to each site. The Burghfield site has a history of flooding, some of it comparatively recently. There have also been concerns raised about potential flooding around the Sellafield site at the Site Stakeholder Group level.

NFLA also note that Aldermaston is under „special measures“ by the Office for Nuclear Regulation for failing to meet a legal obligation relating to the management of radioactive waste at Aldermaston. For it to be considered for storing interim radioactive waste from dismantled submarines under the current management arrangements is of concern to the NFLA.

NFLA welcomes the commitment given to stakeholder engagement by the MoD with the Submarine Dismantling Project. NFLA urges this process to continue with each of the five shortlisted sites and encourages it to remain fully open and transparent as the shortlist is whittled down further with each interested community and the relevant local authorities.

**f. What are your views on our approach to deciding between the shortlisted storage sites?**

It is not possible to ascertain what weighting will be put on the various factors used to decide on a final site. It is the NFLA view that a site which has the capacity to host a storage facility for up to 150 years should be chosen. Any site which is expecting to achieve final site clearance before then should be ruled out. It also means that coastal change and flood risk may need to be revisited in the SEA.

Noting this, during the previous round of consultation for the Submarine Dismantling Project, the MoD undertook a multiple criteria decision analysis (MCDA) activity to arrive at key decisions, with the results corroborated by a similar analysis undertaken by independent advisors to the project. NFLA supports the use of a similar approach to decision-making for selection of an interim storage site. However, cost factors should not be only the predominant decision-making factor in coming to a decision. The MoD must be able to demonstrate that the final site has not simply been decided upon for commercial reasons.

**g. Do you have any comments on the stages that will follow this consultation?**

Information about the consultation meetings with the localities around the five candidate sites was not well publicised or very easy to find. Consideration will need to be given to consulting communities on the transport routes between Devonport and Rosyth and the chosen storage site. The many issues around the safe transportation of radioactive materials by road is a key concern for the NFLA, and local authorities on transport routes should be fully notified and consulted in future parts of this consultation process.

**h. Do you have any comments about the conduct of this consultation or the information provided?**

The national consultation workshops did not need to be so long, and they became repetitive after the morning session. The fact that these meetings lasted all day may have put some people off attending.

NFLA welcomes the MoD's strong commitment to consultation within this process. This is in a marked contrast with the MoD's involvement with other projects – such as the difficult process to bring the MoD to the negotiating table to develop a remediation plan for the Dalgety Bay site in Fife, or its lack of engagement over the Trident nuclear weapons programme or the transportation of nuclear weapons convoys across the UK. MoD should use the positive feedback it has received from this process to inform stakeholder consultation on all aspects of its nuclear policy.

If you have any queries with any section of this response, please do not hesitate to contact me.

Yours sincerely,



Sean Morris  
Secretary of the UK and Ireland Nuclear Free Local Authorities

Sent with the full approval of the NFLA Chair and NFLA Steering Committee

**9. References to this NFLA submission**

- (1) Submarine Dismantling Project, Consultation Document, MoD, 28th October 2011  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/35909/sdp\\_consultation.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/35909/sdp_consultation.pdf)
- (2) NFLA Briefing No.31 Ministry of Defence Submarine Dismantling Project Consultation NFLA Overview and Model Response Feb 2012  
[http://www.nuclearpolicy.info/docs/radwaste/NFLA\\_RWB\\_No\\_31\\_SDP.pdf](http://www.nuclearpolicy.info/docs/radwaste/NFLA_RWB_No_31_SDP.pdf)
- (3) NFLA Briefing No.38 Nuclear Submarine Dismantling Consultation – MoD Response, April 2013  
[http://www.nuclearpolicy.info/docs/radwaste/NFLA\\_RWB\\_38\\_Submarine\\_Dismantling\\_decision.pdf](http://www.nuclearpolicy.info/docs/radwaste/NFLA_RWB_38_Submarine_Dismantling_decision.pdf)
- (4) Sunday Herald 9th March 2014 <http://www.heraldscotland.com/news/home-news/holyrood-rules-out-nuclear-sub-radioactive-waste-dumping-in-scotland.23642216> and Rob Edwards 9th March 2014  
<http://www.robedwards.com/2014/03/dump-nuclear-submarine-waste-in-england-says-scottish-government.html>
- (5) Environment Agency (February 2009) Geological Disposal Facilities on Land for Solid Radioactive Wastes: Guidance on Requirements for Authorisation, page 46 para 6.3.10  
<http://publications.environment-agency.gov.uk/pdf/GEHO0209BPJM-e-e.pdf>
- (6) See Higher Level Radioactive Waste: Likely inventory range; the process for altering it; how the community might influence it and understanding the implications of new nuclear build. Presented to West Cumbria Managing Radioactive Waste Safely Partnership, Pete Roche, 5th August 2010  
[http://www.nuclearwasteadvisory.co.uk/wp-content/uploads/2011/05/Inventory\\_presentation\\_to\\_WCMRWS\\_Aug2010.pdf](http://www.nuclearwasteadvisory.co.uk/wp-content/uploads/2011/05/Inventory_presentation_to_WCMRWS_Aug2010.pdf)
- (7) DECC (March 2010) Consultation on a Methodology to Determine a Fixed Unit Price for Waste Disposal and Updated Cost Estimates for Nuclear Decommissioning, Waste Management and Waste Disposal. Paras 3.2.23 – 3.2.24  
[http://www.decc.gov.uk/assets/decc/Consultations/nuclearfixedunitprice/1\\_20100324145948\\_e\\_@@\\_ConsultationonFixedUnitPricemethodologyandupdatedcostestimates.pdf](http://www.decc.gov.uk/assets/decc/Consultations/nuclearfixedunitprice/1_20100324145948_e_@@_ConsultationonFixedUnitPricemethodologyandupdatedcostestimates.pdf)
- (8) BBC 7th November 2013 <http://www.bbc.co.uk/news/uk-england-cumbria-20228176>
- (9) Nuclear Decommissioning Authority: Managing risk at Sellafield, Public Accounts Committee 4th Feb 2013 <http://www.publications.parliament.uk/pa/cm201213/cmselect/cmpublicacc/746/746.pdf>

**Ministry of Defence Submarine Dismantling Project**  
**Consultation on the site for Interim Storage of Intermediate Level**  
**Radioactive Waste**  
**Response from Nuclear Information Service**

Nuclear Information Service (NIS) is a not-for-profit, independent information service which works to promote public awareness and debate on nuclear weapons and related safety and environmental issues (see <http://nuclearinfo.org> for more information). Our research work is supported by funding from the Joseph Rowntree Charitable Trust.

Nuclear Information Service welcomes public consultation on the Ministry of Defence (MoD) submarine dismantling project and is grateful for the opportunity to respond to this consultation. The storage of waste from redundant nuclear-powered submarines is a controversial and sensitive matter and we support initiatives which will stimulate a mature and informed debate over what to do with this unwanted radioactive legacy. The country has been left with this predicament as the result of unwise decisions made in the past, but it is our responsibility to deal with the problem and we are pleased to see that MoD is taking active steps to address the issue.

Our responses to the questions asked through the consultation process are as follows.

***1. Do you have any comments or views on the proposed RPV storage arrangements?***

On the basis of the information presented in the consultation, the proposed storage arrangements appear robust and suited for containment of intermediate level radioactive waste over a medium term period.

Our broader concern is that, as yet, no permanent arrangements are in place for ultimate long-term management of intermediate level and high level radioactive wastes into the far future. This means that there is a perceptible risk that intermediate level waste from submarines will remain at the storage location for an indefinite, as opposed to interim, period of time if no progress is made in developing permanent radioactive waste management arrangements. At the moment the government hopes to open a national repository for radioactive waste in the 2040s, but it appears increasingly unlikely that this target will be met or even that the arrangements currently in place will be capable of delivering construction of a repository.

If there are delays in building or opening a national repository, the currently scheduled date for acceptance of submarine reactor pressure vessels will be further delayed. Even though MoD has taken a pessimistic view in relation to the 100 year design life for the planned waste storage facility, we are concerned that assumptions made about the timetable for opening the national repository, and possibly also about its storage capacity, are over-optimistic, resulting in a risk that submarine reactor pressure vessels (RPVs) will have to be stored at the selected site for an indefinite period.

It is not fair to expect a local community to host waste from submarines for an indefinite extended period beyond the currently anticipated date of 2070 after which it is hoped that it will be moved to the national repository. Potential host communities must, therefore, be

advised that, regardless of government aspirations, the reality is that the RPV waste may need to be stored on the chosen site indefinitely.

MoD is prudently planning for interim storage arrangements for submarine waste to extend over a period of 100 years, but this is not an acceptable substitute for coherent national policy on radioactive waste management. The government must address this issue as a matter of urgency and MoD should press the Department of Energy and Climate Change and the Cabinet to implement credible long-term arrangements for the management of radioactive waste as a priority.

More significantly, the absence of a realistic programme for the long term management of radioactive waste reinforces NIS's opposition to plans to renew the submarine fleet and thereby to create a second generation of radioactive waste for which there is no management strategy other than indefinite storage. NIS opposes the construction of nuclear powered and nuclear armed submarines, but our immediate position is that unless and until the safety and social acceptability of a repository is demonstrated beyond reasonable doubt, and unless and until that facility is demonstrably available for the receipt of radioactive waste, the UK's civil and military nuclear programmes should be halted. As established by the first Committee on Radioactive Waste Management, the generation of new radioactive waste presents an entirely different range of issues to the imperative to manage legacy wastes which currently exist.

***2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?***

We consider that issues relating to flood risks at the candidate storage site at the Atomic Weapons Establishment (AWE) Burghfield require further more detailed study to establish whether, if waste is stored at this site, it can be protected from flooding over the long term - especially in the context of potentially increased risks resulting from global climate change. We are aware that a planning application has recently been submitted for a flood defence scheme for AWE Burghfield but nevertheless consider that more work is necessary to investigate possible flood scenarios in 2120 and beyond – the latest date for which waste is planned to be stored at the site under a least optimistic scenario. In particular, the cumulative impacts resulting from likely upstream development and the resulting potential for increased run-off in the Burghfield Brook catchment above AWE Burghfield should be investigated further.

***3. Do you have any comments or views on transport, regulation or planning issues?***

Planning applications submitted in the past for development at defence nuclear sites such as the Atomic Weapons Establishment have often invoked 'defence exemptions' allowing MoD to avoid scrutiny over certain aspects of the planning process. All planning applications submitted as part of the Submarine Dismantling Project should follow normal planning processes and, in order to build trust with local communities, no exemptions should be sought. Regulatory permits, Environmental Impact Statements, and other material supporting planning applications should likewise provide full disclosure of information to the public, with no exemptions applied.

Transport of RPVs has the potential to impact upon traffic, especially in the vicinity of the storage site where the RPV cargo will need to be transported along minor roads away from

motorways. Transport of RPVs should be timed to minimise disruption to local communities and the movements should be advertised in advance to local communities and road users. Minor upgrades to existing local roads and traffic infrastructure may be necessary to facilitate RPV transport.

A condition of planning permission should be that the proposed storage facility will only store reactor pressure vessels from the 27 submarines which currently fall within the scope of the Submarine Dismantling Programme, and not be used to store radioactive wastes from any other sources. MoD should be willing to give explicit guarantees in this respect when applying for planning permission.

#### ***4. What do you think are the main issues that we need to consider with each site?***

Nuclear Information Service has a particular interest in Atomic Weapons Establishment sites and the majority of our comments in this section relate to the candidate interim storage sites at Aldermaston and Burghfield.

##### **Burghfield**

We do not consider that the AWE Burghfield site is appropriate for the storage of intermediate level radioactive waste from submarines. The Burghfield site has a history of flooding and in our view is not suitable for further development. We understand that storage of waste from submarines at Burghfield would require an increase in the size of the nuclear licensed site and we consider that this would be undesirable: MoD should instead be seeking to reduce the footprint of its nuclear activities. We also note that radioactive waste which has been generated by operations at AWE Burghfield is currently stored off site at AWE Aldermaston, suggesting that the storage of waste from submarines at Burghfield would be an anomaly.

At local consultation meetings concerns were raised that bridges along the Burghfield Road between the A4 and AWE Burghfield may not be sufficiently wide or strong to support the carriage of an abnormally sized load.

##### **Aldermaston**

Significant quantities of wastes from the defence nuclear programme are already stored at AWE Aldermaston and further quantities will require storage at the site as a result of the AWE decommissioning programme. Under these circumstances Aldermaston might be considered a suitable candidate site for interim storage of radioactive waste from submarines if it can be demonstrated that on safety, environmental, and security grounds storage at Aldermaston poses lower risks than at other candidate sites. If Aldermaston is selected as an interim storage site for submarine waste we would hope that such waste is stored alongside other on-site radioactive wastes in the Nuclear Storage and Processing Area and that opportunities are sought to improve overall radioactive waste management arrangements at the site.

Although AWE Aldermaston may prove to be an acceptable site for the interim storage of waste from submarines the current site operators, AWE Management Ltd, are not necessarily appropriate custodians for the waste. We are concerned at the poor regulatory performance of AWE sites over the past five years and note that AWE is currently under investigation by regulators for failing to meet a legal obligation relating to

the management of radioactive waste at Aldermaston. The company's stakeholder engagement arrangements are weak and lag well behind standards elsewhere in the nuclear sector.

The current situation is unsatisfactory and improvements are necessary at AWE. If Aldermaston is selected as a candidate site then, at the very least, we will expect to see MoD commit publicly to an action plan for dealing with shortfalls in performance at AWE and contingency arrangements for dealing with the situation if improvements are not made – including measures for transferring the AWE management and operation contract to a new site operator if necessary.

## **Sellafield**

We are concerned that, in the absence of any coherent national strategy on radioactive waste management, Sellafield appears to be treated by government and industry as a general dump for the UK's radioactive waste. We do not consider it appropriate to reinforce this impression or add to the waste inventory at Sellafield by selecting the site for the interim storage of radioactive waste from submarine dismantling.

We note too that, as with Aldermaston, there has been recent regulatory enforcement action at Sellafield site and significant concerns about management arrangements at the site.

## **Chapelcross**

Operations at the Chapelcross site are currently winding down as the site is decommissioned, and proposals to store waste from submarines at the site would appear to contradict this trajectory. We understand that the final clearance date for the site is currently anticipated to be 2095. Storage of submarine waste at the site would, under the planned 100 year lifetime of the waste store, extend the life of the legacy site beyond the current target date, which we consider to be undesirable.

We are aware that Scottish Government ministers have expressed opposition to the interim storage of radioactive waste from submarines at the Chapelcross site. Although MoD claims that the Scottish Government's formal policy on the issue is less clear cut, we would nevertheless recommend that MoD accepts the view of Scottish Government ministers and rules Chapelcross out as an interim storage site. Issues of democracy and accountability are at stake here, and MoD should not create a situation under which the Westminster government would be seen to be ignoring the wishes of elected Scottish ministers and exacerbating political tensions between Scotland and Westminster.

## ***5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?***

It is likely that communities will consider the safety, security, and environmental impacts of the waste storage arrangements to be the most important issues they face. In order to allay potential concerns about these matters, MoD will need to monitor and report on performance regularly to the public, and thus should ensure that on site and off site radiation monitoring programmes are developed which address any local concerns.

Channels for communication and engagement with local communities around the storage

site will need to be healthy and actively used, and provide honest information (as opposed to public relations spin) on progress with the project, safety performance, and any setbacks and problems. Local communities should have the opportunity to provide feedback to the site operator and this feedback should be listened to and acted upon. We cannot comment on stakeholder engagement arrangements at the civil nuclear sites which have been shortlisted as candidate interim storage sites, but in our experience the situation at defence nuclear sites, including AWE sites, leaves much to be desired. Communication with local communities usually takes place through Local Liaison Committees which are exclusive and unrepresentative, opaque, meet infrequently, and are not equipped to play a scrutiny role. In our view such committees operate to low standards and are not fit for purpose. A different approach will be necessary at the site selected for interim storage of waste from submarines. As a bare minimum meetings should be open to the press and public and provide opportunities for the public to directly question the site operator, and local authorities, community groups and local non-government organisations should be invited to take part as equal partners alongside government organisations. It should be a condition of management arrangements between MoD and the operator of the interim storage site that stakeholder engagement arrangements should be put in place and match the highest standards in the nuclear sector.

It is reasonable for communities affected by the waste storage arrangements to expect to receive some kind of benefit in compensation for inconvenience and potential hazard that they face as a result of hosting the waste. Rather than focusing on providing financial or infrastructure benefits, we would prefer to see benefits provided in the form of a reduction of existing radiological risks posed by the nuclear site at which the waste is stored. Taking AWE Aldermaston as an example, this could take the form of accelerating the programme for decommissioning redundant facilities at the site, reducing radioactive waste production from manufacturing and research activities, or halting or reducing the frequency of high-hazard activities and experiments. We accept that steps may already be in hand to reduce risks at nuclear licensed sites, but such programmes should be accelerated and extended beyond current plans at the site selected as the RPV storage location. We would encourage MoD to adopt the recommendations made by the the first Committee of Radioactive Waste Management regarding the benefits that communities hosting radioactive waste should expect to receive from government.

Another possible area of concern for local communities is the possibility that the site selected for interim storage of radioactive waste from dismantled submarines may be seen as a suitable storage location for other waste streams from the defence nuclear programme and gradually become a general dump site for MoD's radioactive legacies. Proposals to store waste from the submarine dismantling project may be seen as the 'thin end of the wedge' and MoD must give specific guarantees in this respect. As a bare minimum, waste stores must not be constructed with spare capacity to allow the storage of further reactor pressure vessels beyond the 27 submarines which fall within the scope of the Submarine Dismantling Programme, and further consultation must take place at the appropriate time on arrangements for storing radioactive waste from out-of-service Astute class submarines. No other defence radioactive wastes should be imported to the interim storage site unless this can be shown to represent the best practicable option on safety and security grounds and local communities have given their consent to any such steps following consultation.

Finally, if the Submarine Dismantling Programme is to succeed it will be important for MoD to continue to engage pro-actively with local communities to ensure that they do not feel

that radioactive waste from submarines is being imposed on them against their will. Issues relating to radioactivity and the nuclear industry are matters of concern for many members of the public, and MoD will need to provide assurance over the life of the programme that any concerns raised are being taken seriously and that local communities are in a position to exert influence over the programme if necessary.

## **6. What are your views on our approach to deciding between the shortlisted storage sites?**

The process used to decide between shortlisted sites must be open and transparent, with the rationale for coming to a decision published and explained clearly.

Ultimately the decision on an interim storage site for radioactive waste from submarines should be made on technical grounds. As far as possible, the site selected should be the one where safety and security are shown to be greatest and environmental impacts lowest.

During the previous round of consultation for the Submarine Dismantling Project MoD undertook a multiple criteria decision analysis (MCDA) activity to arrive at key decisions, with the results corroborated by a similar analysis undertaken by independent advisors to the project. We would support the use of a similar approach to decision-making for selection of an interim storage site.

Cost factors will be a factor in coming to a decision, but limited weight should be attached to cost factors and MoD must be able to demonstrate that the final decision was not made for predominantly commercial reasons. In the longer term, it should be a condition of the waste storage contract between MoD and the operator of the site selected for interim storage that financial and contract arrangements will be open and transparent and, specifically, will not be covered by the exemption under section 43 (commercial interests) of the Freedom of Information Act.

In general terms, NIS believes that the following principles should be applied to the submarine dismantling process and the storage of radioactive waste from submarines:

- Waste generation should be minimised and waste produced should be managed in accordance with the waste hierarchy.
- Wastes should be managed and stored as closely as possible to its point of origin.
- Wastes should not be transported unnecessarily and transportation requirements should be kept to a minimum.
- Precautionary principles – such as as low as reasonably practicable (ALARP) emissions and discharges to the environment, best practical methods (BMP) for achieving waste management objectives, and 'concentrate and contain' to reduce the radioactive footprint – should be adopted.
- Wastes must remain in a passively safe condition.
- Doses of radioactivity to workers and the public must be kept to a minimum.

- MoD must retain its duty of care for the waste regardless of ownership of the site where it is stored.

### ***7. Do you have any comments on the stages that will follow this consultation?***

The timetable and programme for the submarine dismantling project which has been presented to the public as part of this consultation programme should be executed to plan, in a timely manner, to allow stakeholders to retain confidence in the project and minimise uncertainty for local communities.

### ***8. Do you have any comments about the conduct of this consultation or the information provided?***

We are pleased that MoD is seeking the views of the public before making a decision on an interim storage site for radioactive waste from decommissioned nuclear powered submarines. We welcome the consultation programme and commend MoD on the high stakeholder engagement standards which have been adopted for the submarine dismantling project. However, we reiterate our view that there is every possibility that the community selected as the waste storage site will end up hosting the waste over a protracted and possibly indefinite time, and that potential host communities must understand this and give their consent to accepting the storage arrangements on an informed basis.

The high standard of stakeholder engagement arrangements adopted by the Submarine Dismantling Project are in marked contrast to past practice in relation to decision-making in the defence nuclear programme affecting communities around nuclear sites. It was notable that in consultation meetings conducted near AWE sites more than one participant pointed out that this was the first time that local communities had ever been consulted on matters relating to AWE. MoD – and also AWE – should take encouragement from this consultation programme and learn lessons so as to improve day-to-day stakeholder engagement arrangements.

In relation to information provided as part of the consultation process, we consider that information on the radioactive inventory of the intermediate level waste – for example isotope content and quantities, activity levels, and the length of time the waste is predicted to remain active – was too vague to allow informed decision-making on the risks posed by the waste, requiring non-government stakeholders to rely on assurances from MoD and government regulators about hazards posed by the waste., rather than assessments from independent sources.

### ***9. Are there any other comments you would like to make?***

We reiterate that the construction of new nuclear powered submarines which will generate further radioactive waste raises very different political and ethical issues to the disposal of legacy wastes. Radioactive wastes from submarines are an unwelcome legacy resulting from unwise decisions made in the past. We have not yet identified a method for managing these wastes and under such circumstances it is irresponsible to continue producing them. MoD should not construct any more nuclear-powered submarines until

and unless this issue has been resolved.

Although government policy for the long term management of higher level radioactive wastes is to place them underground in a geological repository, we are not yet convinced that this is the best option and it is not based around proven technology. Major technical, practical, and ethical questions remain about the feasibility of an underground repository and, as stated above, there is a clear risk that interim storage arrangements for radioactive waste will be extended indefinitely.

Consultation events sometimes seemed to reveal a lack of understanding among the public in the vicinity of the Aldermaston and Burghfield AWE sites about the level and nature of the existing hazards posed by those sites, particularly in relation to the relative hazard posed by storage of intermediate level radioactive waste from submarine dismantling. More honest and frank information needs to be given to communities close to AWE sites about activities at the sites and the risks they pose, and in particular about radioactive waste generation and holdings at AWE and how these may change as a result of any Successor warhead replacement programme and the AWE site decommissioning programme.

Consultation events also revealed a lack of understanding about how security is maintained and how security standards are audited at nuclear sites and within MoD. We realise this is a sensitive area but, given that members of the public who participated in consultation events attached a very high priority to security concerns, we consider that MoD should provide more information and take a more transparent approach to this issue.

Responding organisation:	Nuclear Information Service
Contact person:	Peter Burt
Email address:	<a href="mailto:peter@nuclearinfo.org">peter@nuclearinfo.org</a>
Sites of particular interest:	Aldermaston and Burghfield

We consent to publication of this submission by MoD, although we request that personal details and email addresses are redacted from the published version.

**Ministry of Defence Submarine Dismantling Project**  
**Consultation on the site for Interim Storage of Intermediate Level Radioactive Waste**  
**Comments from the Nuclear Submarine Forum (NSubF)**

The Nuclear Submarine Forum (NSubF) is a network of 16 citizen groups and various individuals who are concerned about the dismantling of the UK's nuclear powered submarines. For more information please see our website at <http://www.nuclearsubwaste.net/>

NSubF is represented on the Advisory Group for the Submarine Dismantling Project (SDP) and also on the consultation sub-group for the project. We are committed to finding a least-impact solution to the problem of managing radioactive waste from the Royal Navy's nuclear powered submarines but also to encouraging best practice in consulting communities local to proposed SDP activity and the wider community. We are pleased that many of our recommendations have been taken on board by the Ministry of Defence (MoD) during the conduct of this consultation exercise.

Our views on the questions asked during the consultation are as follows.

***1. Do you have any comments or views on the proposed RPV storage arrangements?***

NSubF considers that decommissioned nuclear submarines cannot be left afloat, where they are vulnerable to the elements and any radioactive leaks will quickly be dispersed through the environment. We therefore agree that submarines should be dismantled as soon as practicable and that the radioactive wastes removed from the submarines should be stored at a safe and secure location away from the dismantling site.

Any interim storage option should use best available techniques for the secure containment of radioactive waste. The least-bad option is above-ground managed, monitored retrievable storage on land, and we are pleased that MoD has selected this option for the management of reactor pressure vessel (RPV) waste, at least for an interim period. The store constructed to hold the waste should be robust enough to last for an extended period of time, be secure and be capable of life extension if necessary.

A more significant concern is that the ultimate, long term arrangements for management of RPV waste remain uncertain. The government's plans for development of a national repository for radioactive waste are vague and lack credibility. As a result it is likely that radioactive waste from submarines will have to remain in storage at the site selected following consultation for a longer period than the 100 year design life proposed for the store - and possible that it will have to remain there indefinitely.

NSubF takes the view that the preferred option for long term management of radioactive waste is above-ground managed, monitored retrievable storage on land and the interim storage arrangements proposed by MoD are consistent with this. However, local communities in the vicinity of the selected RPV waste storage site should understand that the realistic likelihood is that the waste will be stored at the site for an indefinite - rather than interim - period, and MoD must provide honest information about this. MoD should also ensure that the waste storage facility used to hold RPV waste is built with a design life of considerably greater than 100 years, and also press the government to develop a credible policy for the long term management of radioactive wastes.

Because the government has no credible policy for managing radioactive waste, the UK should end the practice of powering its submarines with nuclear reactors. In the absence of a solution to the problem of dealing with radioactive waste, building submarines with reactors which generate further waste is unethical, irresponsible and places an unfair and unacceptable burden on future generations who will have to tackle the problem of managing the waste. The first priority under the current circumstances must be to stop generating new nuclear wastes, which means no new submarine reactors should be built and that existing ones should be rapidly decommissioned.

***2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?***

We consider that the strategic environmental assessment for the project is relatively robust and sound because MoD followed advice given by the SDP Advisory Group and consultation sub-group in specifying and undertaking the assessment. The option selected for storage of RPV waste should, as far as possible, be the option which minimises environmental impacts.

***3. Do you have any comments or views on transport, regulation or planning issues?***

The SDP's terms of reference cover the 27 submarines which were in service with the Royal Navy or awaiting decommissioning at the time the project commenced. They do not cover Astute class or any future class of nuclear powered submarine that MoD may wish to build. This is because, when the project started, many members of the SDP Advisory Group took the view outlined above that no new submarine reactors should be built in the absence of a credible solution for managing radioactive waste. MoD has, in our view unwisely, disregarded this position and continued to build new nuclear powered submarines, but this does not alter the fact that the scope of the SDP does not cover any radioactive wastes generated by the new submarines.

MoD must therefore resist the temptation to build an interim waste store which has spare capacity to hold radioactive wastes from any source other than the 27 submarines which are included within the scope of the SDP. The planning application for the facility must only be for a building capable of holding waste from 27 submarines, and MoD must give a specific guarantee to the local planning authority that the store will not be used to hold waste from any other source.

Transport of nuclear waste from the submarine dismantling locations to the interim storage site should be minimised, and as far as possible the site selected as a storage location should be the one which results in overall the least mileage for waste movement.

***4. What do you think are the main issues that we need to consider with each site?***

NSubF's policy is that existing sites should be used to manage radioactive wastes. No new sites, or extensions to existing sites should be used for radioactive waste as a result of interim storage arrangements. RPV storage at the shortlisted Atomic Weapons Establishment site at Burghfield would require an extension of the nuclear licensed site there, and so this site should be ruled out as a candidate location for waste storage.

Local communities in the vicinity of the site selected must understand and accept the potential risks and inconvenience associated with hosting radioactive waste from submarines, and should receive some benefits from doing so. There must be an indication of a broad measure of informed consent from across host communities before the decision is made to select a particular site as the waste storage location. News reports suggest that the Chapelcross Site Stakeholder Group has expressed concerns about storing radioactive waste from submarines at Chapelcross, raising questions about the lack of any benefit to them.

The Scottish Government's environment minister has also expressed opposition to the interim storage of submarine waste in Scotland, also bringing the suitability of the Chapelcross site into question. Given that the minister is an elected representative of the Scottish public, we would urge MoD to respect this view in the interests of democracy.

***5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?***

Local communities are likely to share our view that safety must be the priority in selecting methods and sites, with security and environmental impact also important.

There will need to be effective arrangements for stakeholder engagement and communication with local authorities at the selected site. Local communities will want to be kept informed about progress with the

project and to continue to be able to have their say. Excepting the SDP, MoD's record on stakeholder engagement and community engagement around its nuclear sites is poor, and improvements are needed to ensure that efforts are made to engage with a broad spectrum of the community around the interim storage site, not just officials, politicians, and local elites.

***6. What are your views on our approach to deciding between the shortlisted storage sites?***

An open transparent site selection process must be used to identify the most suitable site for storing nuclear wastes arising from the decommissioning of nuclear powered submarines. Safety must be the priority in selecting methods and sites.

All information relating to decisions on the management of all nuclear wastes should be made fully transparent and publicly available so that it is clear how the site selection and other decisions are made. Not only the criteria used must be published but also the weightings given them by the project team.

***7. Do you have any comments on the stages that will follow this consultation?***

The planned Ministerial announcement on the location of the storage site should not be delayed so as to minimise uncertainty for communities in the surrounding area. Further work should proceed in an open and transparent way with the public being kept informed, and consultation taking place where appropriate.

***8. Do you have any comments about the conduct of this consultation or the information provided?***

Better quality information should have been provided on nature of the radioactive waste generated from submarine dismantling. Details of isotope content and quantities and activity levels was lacking, making it difficult to assess the level of risk posed by the waste.

***9. Are there any other comments you would like to make?***

The most important point that we wish to make, which we consider warrants repeating, is that MoD should not be generating any further quantities of radioactive waste in the absence of a proven solution for its long term management. It is irresponsible and unethical for MoD to build new nuclear powered submarines, and construction and development of new submarines should cease until this problem has been resolved.

NSubF's policy is that radioactive wastes should be concentrated and contained, not diluted and dispersed. It is not clear whether all the radioactive waste generated during submarine dismantling will be retained within the RPV, or whether other radioactive wastes will also be produced. MoD should clarify this point and if necessary explain what steps will be taken to manage radioactive wastes other than the RPV.

The SDP Advisory group has collectively put a lot of time and effort into the process to date and it would be a pity to lose that perspective. Once the project starts the dismantling process there will be liaison with local stakeholder groups at the dismantling and storage sites. However, we can see a role for the Advisory group to keep an eye on the overall process and particularly ensure that local liaison is undertaken in the same spirit that the SDP has come to embrace in recent years. We would suggest an annual meeting to review progress.

sdp@instinctif.com

16 February 2015

Executive Director: Philip Matthews  
e-mail: philip.matthews@nuleaf.org.uk

**Director's Assistant:** Catherine Draper  
e-mail: catherine.draper@nuleaf.org.uk

Tel: 01473 264833

Dear Sir or Madam,

## **Re: Shortlisted sites consultation – Submarine Dismantling Project**

I write on behalf of NuLeAF, (the Nuclear Legacy Advisory Forum), a Special Interest Group of the Local Government Association (LGA). NuLeAF is supported by 108 local authorities and 3 national park authorities across England and Wales. Our remit encompasses all **aspects of the management of the UK's nuclear waste legacy**. Our primary objectives are:

- to provide a mechanism to identify, where possible, a common local government viewpoint on nuclear legacy management issues;
- to represent that viewpoint, or the range of views of its member authorities, in discussion with national bodies, including the Welsh and UK Government, the NDA and the regulators;
- to seek to influence policy and strategy for nuclear legacy management in the interests of affected communities; and
- to develop the capacity of its member authorities to engage with nuclear legacy management at a local level.

NuLeAF has had a long engagement with the MOD around the issue of submarine dismantling, through both the ISOLUS and SDP programmes. As NuLeAF has been a member of the Advisory Sub-Group to the SDP project, we have had the opportunity to comment on the process as it has developed. However, we would wish to make a few further comments at this time:

### **Question 3: Do you have any comments or views on transport, regulation or planning issues?**

It is important that MOD and the chosen site developer/operator engage effectively with the local authority at the host site on transportation and planning issues. Care should be taken that the transportation of the RPVs does not impinge unduly on local traffic and consideration should be given to the timing of transport and its effect on the local community. If necessary, investment in new rail or road infrastructure may be required where current provision is not fit for the task of RPV transportation.

**Question 5: Once a site is chose, what do you think will be the most important issues for the potentially affected community?**

Safety and security will be priority considerations for the communities surrounding each site. MOD has already gone to considerable lengths to reassure on this topic through its stakeholder engagement. NuLeAF would encourage the SDP team to ensure this level of engagement is maintained and the operator at the chosen site understands the importance of these factors to the host community.

MOD has stated that it does not consider that this project warrants the provision of community benefits. NuLeAF would though encourage MOD to support the operator of the site in providing a package under Section 106 of the Town & Country Planning Act to mitigate the impact, both real and perceived, of hosting a store hosting Intermediate Level **Radioactive Waste over a period of many generations. NuLeAF would draw MOD's attention** to the S106 agreement agreed at Sizewell in Suffolk over the provision of a Dry Fuel Store on the B station site, where the building was over and above what had been agreed under the original planning agreement.

**Question 9: Are there any other comments you would like to make?**

NuLeAF's view is that the approach to engagement adopted by the SDP, and the rigour of the site selection process, has much to commend it.

However, rightly or wrongly, there is a perception among some that the different approach to radioactive waste management adopted by the Scottish Government may act against the fair consideration of the Chapelcross site. It is important that MOD is able to show clearly how all factors were weighted in reaching the final decision.

Also, while as noted above, we believe this to be a good consultation process, we feel that the consultation document could have been clearer on some of the important background information. In particular it would have been useful to have more on the level of radioactivity in the RPVs, the types of radionuclides present and how they are likely to decay.

I hope these comments are of use.

Yours faithfully



**Philip Matthews**  
Executive Director

Our Ref: ORG13-A2970  
CSM/JC/

Your Ref:

Submarine Dismantling Project  
FREEPOST RSKJ-KRAH-YZRJ  
c/o Instinctif Partners Ltd  
4<sup>th</sup> Floor Dukesbridge Chambers  
1 Duke Street  
Reading  
RG1 4SA

If telephoning ask for:  
Jim Cochrane

13 February 2015

By email: [sdp@instinctif.com](mailto:sdp@instinctif.com)

Dear Sir or Madam

**Ministry of Defence Submarine Dismantling Project (SDP) Consultation Document on the Site for Interim Storage of Intermediate Level Radioactive Waste**

Thank you for providing the Scottish Environment Protection Agency (SEPA) with the opportunity to comment on the Ministry of Defence (MoD) Submarine Dismantling Project (SDP) Consultation on the process and arrangements to select the site to be used to store Intermediate Level radioactive Waste (ILW).

We have submitted SEPA's response to the Strategic Environmental Assessment (SEA) in conjunction with this response; this will also be submitted via the SEA Gateway.

SEPA's response to this consultation document is in the context of our staff having engaged with MoD throughout the Submarine Dismantling Project (SDP) and being represented as a member at meetings of the SDP Advisory Board and the Regulatory Interface Forum. We have also attended local events and national workshops held in Scotland to explain our duties and responsibilities for regulating ILW arising from any submarine dismantling work that takes place on the Rosyth Royal Dockyard site and to answer any questions there may be.

In general, SEPA supports MoD's plans to dismantle those submarines which have left operational service to realise an overall reduction in risk and liabilities. Therefore, we will continue to engage with MoD as its SDP work progresses.

The consultation document asks for views on five proposed sites and the arrangements to store the Reactor Pressure Vessels (RPVs) that arise from dismantling submarines. The RPVs are classified as ILW. SEPA has no comment to make as to which of the five short-listed sites the MoD has chosen is the best; the final decision about the preferred storage site will be for the MoD to take. However, if MoD decides to select the Chapelcross site near Annan as its preferred site to store submarine RPVs, there are potential consequences for the site operator in terms of the arrangements SEPA will impose for regulating this site under the Radioactive



Chairman  
David Sigsworth  
  
Chief Executive  
James Curran

SEPA Stirling Office  
Strathallan House, Castle Business Park,  
Stirling FK9 4TZ  
tel 01786 457700 fax 01786 446885  
[www.sepa.org.uk](http://www.sepa.org.uk)

Substances Act 1993 (RSA 93). The following two paragraphs describe the regulatory implications of any MoD decision to select the Chapelcross site to store RPVs.

Prior to storing RPVs, the current RSA 93 authorisation, granted by SEPA to the site operator (currently, Magnox Ltd), would need to be varied. The RSA 93 authorisation would need to be varied to (i) include discharges of radioactive waste from the RPV store, (ii) to include a nominated release point for gaseous radioactive waste discharges and may need to be varied further if the current conditions need to change, or there is a need to increase the authorised radioactive waste disposal limits. Where a variation is required, an application to SEPA to vary the current RSA 93 authorisation would be needed. SEPA would then determine that application as part of our decision on whether to grant a new RSA authorisation, or not. A new RSA 93 authorisation would need to be in place before Magnox Ltd could accept any RPVs to be stored on the Chapelcross site.

Separately, Rosyth Royal Dockyard Limited (who operate the Rosyth site) would have to apply to SEPA for authorisation under RSA 93 to transfer the RPVs at Rosyth to Chapelcross for long-term storage. Once the final geological disposal facility was ready, the Chapelcross site operator would have to apply to SEPA for authorisation under RSA 93 to transfer the RPVs and any other ILW from Chapelcross to the final geological disposal site.

Any application made to SEPA to vary or obtain a new RSA 93 authorisation would be subject to statutory and public consultation. Our public consultation would be separate, and in addition to, the RPV site storage consultation plans proposed by MoD. SEPA's RSA 93 consultation process requires that we consider all responses from the public as part of our process to decide which conditions and limitations to include in any new or varied RSA 93 authorisation we may grant.

SEPA notes that page 17 of the consultation document concludes that the potential environmental effects arising from the construction, operation and decommissioning of an RPV store apply to all sites, but do not discriminate between any of the five short-listed sites. Also, the SEA concludes that no significant SEA issues specific to Chapelcross were identified.

SEPA agrees with the conclusion that there are likely to be no significant environmental effects associated with discharges or disposals of radioactive waste from the RPV store. However, if Chapelcross is selected as the site for the RPV store, SEPA would expect the site operator, currently Magnox Ltd, to assess the effects of any discharges or disposals from the RPV store and use Best Practicable Means to ensure doses to the local population and the environment are as low as reasonable achievable.

As Scotland's environmental regulator, SEPA believes that the environmental effects to be of utmost importance and would wish MoD to update these effects as the project progresses and more specific information about the RPV store becomes available. Please refer to our SEA response for further comments on the potential environmental effects of the RPV store.

As a public body committed to openness and transparency, SEPA feels it is appropriate that this response be placed on the public record. If you require further clarification on any aspect of this correspondence, please contact Jim Cochrane, RS Specialist I, SEPA Corporate Office, at the address shown.

Yours sincerely

A handwritten signature in black ink that reads "Calum MacDonald". The signature is written in a cursive, slightly slanted style.

Calum MacDonald  
Director of Operations

Our ref: PCS/137077  
SG ref: UK00048/ER

Environmental Assessment Unit  
Scottish Government  
Victoria Quay

If telephoning ask for:  
Angela Burke

By email only to: [sea.gateway@scotland.gsi.gov.uk](mailto:sea.gateway@scotland.gsi.gov.uk)

19 February 2015

Dear Sir / Madam

**Environmental Assessment of Plans and Programmes Regulations 2004  
Defence Equipment and Support - Submarine Dismantling Project: Interim  
Intermediate Level Waste (ILW) Storage Site Selection  
Environmental Report**

Thank you for your Environmental Report (ER) consultation submitted under the above Act in respect of the Defence Equipment and Support - Submarine Dismantling Project: Intermediate Level Waste (ILW) Storage Site Selection. This was received by SEPA via the Scottish Government SEA Gateway on 17 November 2014.

We have used our scoping consultation response to consider the adequacy of the ER and are generally content with the assessment. Our principle concern relates to the Chapelcross site in Scotland where SEPA has regulatory responsibilities.

Our response to the ER can be found in Appendix 1. Please note, this response is in regard only to the adequacy and accuracy of the ER and any comments we may have on the Plan itself will be provided separately.

Should you wish to discuss this environmental report consultation, please do not hesitate to contact me on 0131 449 8574 or via our SEA Gateway at [sea.gateway@sepa.org.uk](mailto:sea.gateway@sepa.org.uk)

Yours sincerely

Angela Burke  
Senior Planning Officer

Ecopy: [hssea.gateway@scotland.gsi.gov.uk](mailto:hssea.gateway@scotland.gsi.gov.uk); [sea\\_gateway@snh.gov.uk](mailto:sea_gateway@snh.gov.uk)



Chairman  
David Sigsworth  
Chief Executive  
James Curran

**Edinburgh Office**

Clearwater House, Heriot Watt Research Park  
Avenue North, Riccarton, Edinburgh EH14 4AP  
tel 0131 449 7296 fax 0131 449 7277  
[www.sepa.org.uk](http://www.sepa.org.uk)

## **Appendix 1: Comments on the Environmental Report (ER)**

### **General comments**

Our principle concern relates to the identification of potential effects in Scotland and ensuring that any such effects are appropriately mitigated and monitored. As such, our response to the ER focuses on the assessment of the Chapelcross (NDA) site which is located in south-west Scotland, where SEPA has regulatory responsibilities.

### **Assessment**

- 1.1 The predicted environment effects of the plan are clearly set out and described in an easy-to-follow manner. We are satisfied that the relevant environmental issues have been considered and agree with the findings, in particular, that there are likely to be no significant environmental effects associated with the discharge or disposal of radioactive waste from the Reactor Pressure Vessel stores.
- 1.2 The exception to this is the consideration of environmental issues related to the management of controlled and hazardous waste arising from the Submarine Dismantling Project (SDP) which has been excluded from the assessment. At the scoping stage we recommended that the impacts associated with all waste generated during construction and decommissioning of the ILW store should be factored into the assessment. Decommissioning of the ILW storage may generate significant waste streams and may include contaminants and hazardous substances typically associated with shipbreaking that have the potential to have significant environmental effects. In response to our scoping comments the author's state (page 214-215) that the SEA has considered the issues from other waste arising's at an appropriate level at this stage and referenced the Scottish Governments Higher Activity Waste policy.
- 1.3 We note that this has been carried through to the waste management topic assessment, which says that that most of the waste generated during decommissioning would be steel and concrete (which would be recycled) and only predicts a minor negative impact for other waste types. Table 11.2 states that this could be mitigated through standard considerations at the planning stage in the EIA and associated CEMP.
- 1.4 Although we consider that the environmental issues related to the management of controlled and hazardous waste arising from the SDP project could be significant and should have been assessed as part of the SEA, we are content that this can be covered at the project stage through the EIA process and CEMP. As highlighted in paragraph 1.7 of our response we recommend that this is included as one of the mitigation measures that needs to be addressed at a lower level.

### **Baseline Information**

- 1.5 We are content with the level of baseline information that has been presented and have no further comments to make.

## Mitigation

- 1.6 We are generally supportive of the mitigation measures for the Chapelcross site. As summarised in Table 11.2 the majority of these measures are generic across all of the sites and will be delivered at the project stage as part of the Environmental Impact Assessment (EIA) process.
- 1.7 In order to ensure that the issues identified in the ER are taken forward to project level we recommend that this information is presented in a simple table such as that set out below and included in the SEA Post Adoption Statement. Including such a table in the finalised programme document will ensure that the issues of relevance to a particular priority are clearly identified rather than simply providing a generic overview in the post adoption statement.

<b>Issue / impact identified in ER</b>	<b>Mitigation measure / additional assessment required</b>	<b>Level at which it will be addressed</b>	<b>Lead authority</b>	<b>Timescale</b>
Insert effect recorded in Environmental Report	Insert mitigation measure or additional assessment required to address effect	E.g. project level – EIA or more detailed CEMP stage	Insert relevant authority	As appropriate



**Scottish Natural Heritage**  
**Dualchas Nàdair na h-Alba**

All of nature for all of Scotland  
Nàdar air fad airson Alba air fad

Ms Sue Jordan  
Westdown Camp  
Tilshead  
Salisbury  
SP3 4RS

Date: 18 February 2015  
Our Ref: CEA134153

Dear Sir

**The Environmental Assessment of Plans and Programmes Regulations 2004:  
UK00048 Environmental Report – defence equipment and support – submarine  
dismantling project: Intermediate-Level Waste (ILW) storage**

Thank you for your scoping consultation received via the Scottish Government SEA Gateway on 17th November 2014. I have reviewed the report on behalf of Scottish Natural Heritage in our role as a Consultation Authority, under Section 12 (6) of the above Regulations. Our comments on the Environmental Report are set out below.

We have only considered the Environmental Report where it relates to impacts within Scotland in line with our remit from the Scottish Government.

We note that the Environmental Report has taken account of our scoping comments and clear details have been provided of the changes that you have made.

We have no further comment to make or concerns to raise having reviewed the Environmental Report.

We are satisfied that the full range of relevant environmental issues/concerns and key trends have been correctly identified. The assessment of likely significant effects on the environment has been carried out satisfactorily. We are satisfied with the level of mitigation and monitoring proposed given the low level of environmental impacts previously identified in the Environmental Report.

We look forward to reviewing the details of the EIA and CEMP for the Chapelcross site should that be required in due course.

Please contact Stuart Graham (Tel. 01387 272440 or E-mail [stuart.graham@snh.gov.uk](mailto:stuart.graham@snh.gov.uk)) if you have any questions about this advice.

Yours faithfully

**Chris Miles**

Unit Manager

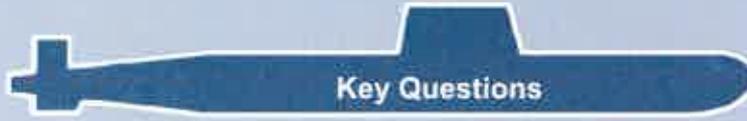
Southern Scotland

Cc: [sea.gateway@scotland.gsi.gov.uk](mailto:sea.gateway@scotland.gsi.gov.uk), [sea\\_gateway@snh.gov.uk](mailto:sea_gateway@snh.gov.uk),  
[sea.gateway@sepa.org.uk](mailto:sea.gateway@sepa.org.uk), [HSSEA.gateway@scotland.gsi.gov.uk](mailto:HSSEA.gateway@scotland.gsi.gov.uk)



INVESTOR IN PEOPLE

Scottish Natural Heritage, Greystone Park, 55/57 Moffat Road, Dumfries, DG1 1NP  
Email [Southern\\_scotland@snh.gov.uk](mailto:Southern_scotland@snh.gov.uk) Tel 01387 272440 Fax 01387 259247 [www.snh.org.uk](http://www.snh.org.uk)



## Key Questions

You can use this page to record your comments, or write to us by post or email. It helps with our analysis if you refer to these question numbers in your response but it is not essential. Providing your contact details overleaf is optional. Please read the data protection statement before submitting your comments.

1. Do you have any comments or views on the proposed RPV storage arrangements?

*AWE Aldermaston appears to be an appropriate site for RPV storage.*

2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?

*We believe AWE Aldermaston has the expertise to deal with this.*

3. Do you have any comments or views on transport, regulation or planning issues?

*Concerned about the impact on local roads.*

4. What do you think are the main issues that we need to consider with each site?

*AWE security and site capacity to build this facility.*

5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?

*Managing the public perception of any potential downsides.*

6. What are your views on our approach to deciding between the shortlisted storage sites?

*Appears to be very thorough and professional.*

7. Do you have any comments on the stages that will follow this consultation?

*No*

8. Do you have any comments about the conduct of this consultation or the information provided?

*Clear, professional and wide reaching.*

9. Are there any other comments you would like to make?

*Wish to be kept informed of the progress of the project.*



## Your Details (optional)

Your name.	Town Clerk
Organisation (if any).	Tadley Town Council
Which site are you most interested in, if any?	AWE Aldermaston
If you include an address or email here, we will add you to our register and let you know when announcements are made.	clerk@tadleycouncil.org
Are you happy for your comments to be published on our website?	Yes <del>NO</del>

## Online Documents

Further information and all the SDP consultation documents are available at:

<https://www.gov.uk/government/publications/submarine-dismantling-project-interim-storage-of-intermediate-level-radioactive-waste>

## Contact Information

Submarine Dismantling Project  
 FREEPOST RSKJ-KRAH-YZRJ  
 c/o Instinctif Partners Ltd,  
 4th Floor, Dukesbridge Chambers,  
 1 Duke Street,  
 Reading RG1 4SA.

Phone 0118 983 9474  
 Email SDP@instinctif.com

### Before submitting your comments, please read this data protection statement

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it will be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on MOD.

The MOD will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.



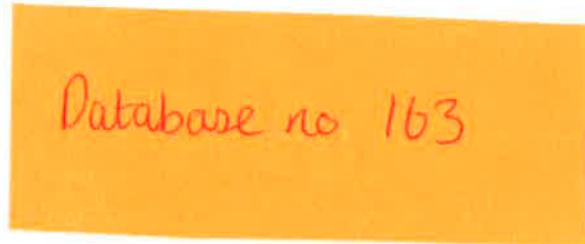


# THEALE PARISH COUNCIL

Chairman: Councillor Charles Bateman  
Parish Office, The Pavilion, Englefield Road, Theale, Reading, RG7 5AS

Telephone: 0118 9306592 – E-mail: enquiries@tpcouncil.plus.com

Submarine Dismantling Project  
FREEPOST RSKJ-KRAH-YZRJ  
c/o Instinctif Partners Ltd  
4<sup>th</sup> Floor, Dukesbridge Chambers  
1 Duke Street  
Reading RG1 4SA



10<sup>th</sup> December 2014

Dear Sirs,

## Submarine Dismantling Project

Theale Parish Council has discussed the consultation documents provided and would like to make the following comments on the submarine dismantling project:

The council is concerned about the proposal to store intermediate level waste at either Aldermaston or Burghfield. Both these sites are in or close to densely populated areas and the council is of the opinion that population density, both residential and commuting should be a factor in deciding the most appropriate site for a potentially hazardous operation.

The council is also concerned about the proposal to transport this waste by road. Aldermaston and Burghfield are not geographically close to the current submarine storage sites and thus a long road journey would be required to reach these two sites. The vehicles used will be very large and heavy and the route used would have to be main roads which are heavily used and already congested. Again, a long road journey through densely populated areas greatly concerns the council in terms of safety and the possible risk to the public.

The council would also like to point out that AWE's record for security and safety is fairly poor, it is already under investigation for lapses in these areas. The council expresses concern that AWE may be entrusted with such a high profile and potentially hazardous project.

Yours faithfully,

A handwritten signature in black ink, which appears to read 'Jo Friend'.

Jo Friend

Clerk to the Council

# Nuclear Awareness Group (NAG) Ltd

09 FEB 2015

c/o RISC  
35-39 London St  
Reading RG1 4PS

4<sup>th</sup> February 2015

Database no 240

Submarine Dismantling Project  
c/o Instinctif Partners Ltd  
4<sup>th</sup> Floor, Dukesbridge Chambers  
1, Duke St, Reading, RG1 4SA

Dear Sirs

## **Submarine Dismantling Project Consultation on the site for storage of Intermediate Level Radioactive Waste**

### **Comments from Nuclear Awareness Group**

Nuclear Awareness Group (NAG) is a Reading-based local group which has the following aims:

(i) to work to promote public awareness of nuclear safety and environmental issues and nuclear policies related to the Atomic Weapons Establishment (AWE) Aldermaston and Burghfield during production, maintenance, decommissioning and disarmament of nuclear weapons in order to foster an informed debate on these issues.

(ii) to encourage best practice on all health and safety matters related to the handling of radioactive materials in order to prevent any environmental pollution from nuclear radiation.

Most of our members have now visited the Submarine Dismantling Project exhibition, and have asked me to thank you for the well-presented and thoughtful way that this consultation has been conducted. We welcome the open and informative approach taken by the Ministry of Defence in undertaking this consultation, which is a refreshing contrast to the usual low-key approach taken by AWE in informing local communities about developments at their sites. The consultation programme organised by the Submarine Dismantling Project has highlighted the poor standards of community engagement which currently exist at AWE and other defence nuclear sites, and NAG feels that the Ministry of Defence must take steps to improve the current unsatisfactory situation in this respect.

We do not feel competent to comment on technical matters relating to the interim storage of radioactive waste from submarines, and this submission concerns how - as a group which is focussed on the two Atomic Weapons Establishment nuclear sites and their impact on the local community - we feel about the submarine waste being stored in our neighbourhood.

Our group has not been able to reach a unanimous view on whether intermediate level radioactive wastes from decommissioned nuclear powered submarines should be stored at an AWE site. Some

of us feel that the presence so close of two active nuclear sites is enough of a burden, and that the radioactive waste holdings dating from sixty years of the UK's military nuclear programme which are already stored at AWE Aldermaston are already more than enough. Adding substantially to this waste stockpile, as would be the case if waste from decommissioned submarines were stored at Aldermaston, might result in a perception that this populated part of Berkshire is becoming Cumbria's sibling as a location for storage of the UK's radioactive waste.

An additional perceived burden is the likelihood that quite shortly, warhead production will become active again at Aldermaston, and once again, after some years of relative calm, the spectre of air and water-borne radioactive discharges looms over us, especially in the area downwind from both sites, which stretches to Reading. Our group started 20 years ago in response to the childhood leukaemia cluster in that area. NAG members currently have concerns about AWE plc's recent poor regulatory record, including enforcement action which is currently under way in relation to the management of radioactive waste at Aldermaston, and over possible side-effects for the local community of Aldermaston taking a more high-profile role in waste management. We also feel that the flood risk history of the AWE Burghfield site raises major questions about the suitability of this site as a long term storage location for radioactive waste of any kind.

Other members were more welcoming, pointing out that the submarine waste was relatively low activity and inert, would come pre-packaged, and would not emit discharges. Despite current problems with dealing with the Aldermaston waste stockpile, the staff there do have expertise in handling radioactive waste which might not necessarily be the case at some of the other short-listed sites. It was also hoped that a greater focus on waste storage might enable AWE to diversify from warhead manufacture and move away from being part of the global nuclear weapons problem.

What we were agreed on was that whichever is the chosen host community, it should be offered a token of recognition in the form of a local benefit, and that this – especially in the case of communities like ours where there is already a long history of risk associated with the nearby nuclear plant – should take the form of radiological hazard reduction rather than money. In the case of AWE sites, this could take the form of acceleration of the site decommissioning programme or a decision not to manufacture new warheads at AWE. It will also be important to keep host communities informed about progress with the interim storage programme during the life of the Submarine Dismantling Project, which may require strengthening of communication arrangements between the site operator and local community.

We also agreed that the Ministry of Defence is faced with the difficult, expensive, and unwelcome problem of deciding how to manage radioactive waste from nuclear powered submarines as a result of unwise decisions taken in the past to build these submarines. In order to avoid handing a similar legacy on to future generations we must learn lessons from the past and cease building any further nuclear powered submarines.

Yours sincerely



Evelyn Parker Secretary

Nuclear Awareness Group

<http://www.nuclearawarenessgroup.org.uk>

# **WOKINGHAM BOROUGH COUNCIL**

**AN INDIVIDUAL EXECUTIVE MEMBER  
DECISION**

**BY COUNCILLOR JOHN KAISER,  
EXECUTIVE MEMBER FOR PLANNING AND  
HIGHWAYS**

**RELATING TO CONSIDERING A RESPONSE  
OF THE COUNCIL TO THE CONSULTATION  
BY THE MINISTRY OF DEFENCE ON THE  
SUBMARINE DISMANTLING PROJECT**

**WILL BE MADE IN FF4B**

**ON**

**WEDNESDAY 4 FEBRUARY 2015**

**AT 8.30am**

**YOU ARE WELCOME TO ATTEND**

**NOTICE OF  
INDIVIDUAL EXECUTIVE MEMBER DECISION**

<b>ITEM NO.</b>	IMD 2015 - 04
<b>TITLE</b>	Considering a Response of the Council to the Consultation by the Ministry of Defence on the Submarine Dismantling Project
<b>DECISION TO BE MADE BY</b>	Councillor John Kaiser, Executive Member for Planning & Highways
<b>DATE AND TIME OF DECISION</b>	8.30 am on Wednesday 4 February 2015
<b>VENUE</b>	FF4B
<b>REPORT TO BE PUBLISHED ON</b>	27 January 2015

**INDIVIDUAL EXECUTIVE MEMBER DECISION**  
**REFERENCE IMD: 2015 - 04**

**TITLE** Considering a Response of the Council to the Consultation by the Ministry of Defence on the Submarine Dismantling Project

**FOR CONSIDERATION BY** Councillor John Kaiser, Executive Member for Planning & Highways

**ON** Wednesday 4 February 2015

**TIME** 8.30am

**WARD** Shinfield

**DIRECTOR** Heather Thwaites, Director of the Environment

**OUTCOME / BENEFITS TO THE COMMUNITY**

That the final location chosen by the Ministry of Defence for the interim storage of intermediate level radioactive waste arising from the submarine dismantling project has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

**RECOMMENDATION**

The Executive Member for Planning and Highways

- a) approves the comments outlined in this report; and
- b) that they be submitted as a formal response to the consultation from the Ministry of Defence on their Submarine Dismantling Project (in particular that the authority indicates that it objects to the choice of either Aldermaston or Burghfield if this impacts upon the Detailed Emergency Planning Zones around these sites)

**SUMMARY OF REPORT**

The Ministry of Defence has published their Submarine Dismantling Project consultation which lists five sites for the interim storage of intermediate radioactive waste, two of which are close to the borough – the Atomic Weapons Establishment (AWE) facilities at Aldermaston and Burghfield. Around these sites, Detailed Emergency Planning Zones (DEPZ) are defined (see policy TB04 of the Managing Development Delivery (MDD) Local Plan) to ensure that any issues associated with the continued operation of the current nuclear facilities are considered in assessing development proposals around these sites.

Since the storage of waste could affect the DEPZ around the AWE facilities at Aldermaston and Burghfield, it is important to respond so that any issues for Wokingham Council associated with their development can be addressed.

## **Background**

The Ministry of Defence is consulting upon their Submarine Dismantling Project: Sites for Interim Storage of Intermediate Radioactive Waste from 14 November 2014 until 20 February 2015. The consultation document indicates there are five potential sites for the interim storage of waste until the Geological Disposal Facility is available after 2040. The five sites being considered for the storage of the nuclear reactors arising from the dismantling of submarines are the AWE facilities at Aldermaston and Burghfield; Sellafield, Cumbria; Chapelcross, Dumfriesshire and Capenhurst, Cheshire.

It is important to provide a response to the consultation so that those factors which could concern Wokingham Borough can be resolved. This includes addressing the impacts of the storage of radioactive waste at either AWE Aldermaston or Burghfield for implementing the land use planning strategies of the authorities around these sites - Basingstoke & Deane, Reading, West Berkshire and Wokingham.

## **Analysis of Issues**

Whilst the consultation document details how the five sites were selected and what nuclear activities occur on each site, it does not explain how the interim storage of waste could affect the Detailed Emergency Planning Zones (DEPZ) around the sites. Within the DEPZ around Aldermaston and Burghfield, advice from the Office for Nuclear Regulation indicates that proposals which increase the number of people living, working or visiting these areas should be rejected, where these additional people cannot be accommodated in the existing emergency plans overseen by West Berkshire Council. The existing emergency plans are overseen by West Berkshire Council since both AWE sites are located within that authority. Policy TB04, paragraphs 3.12-3.18 and Appendix 5 of the MDD indicates how the DEPZ and wider consultation zones are defined around these sites and indicates that for Aldermaston and Burghfield the DEPZ's are currently set at 3km and 1.5km respectively.

Whilst the DEPZ's are based upon the current activities occurring at these sites, there is no information within the Ministry of Defence's consultation on whether the choice of either Aldermaston or Burghfield as the interim stage facility for intermediate level radioactive waste could result in a changes to the boundary of these areas and/or amendments to any headroom for additional people to live, work or visit the area within a revised emergency plan. Due to the impacts of the DEPZ boundaries on the acceptability of development approved, committed or proposed (including through the relevant Development Plans of the four authorities including Wokingham Borough), it is essential that this is raised during the consultation.

If the interim storage of intermediate level radioactive waste at either the AWE facilities at Aldermaston and/or Burghfield does not affect the DEPZs and associated consultation zones currently defined around the sites, it is considered that the authority has no further comments on which of the five potential waste sites should be selected.

## **FINANCIAL IMPLICATIONS OF THE RECOMMENDATION**

***The Council faces severe financial challenges over the coming years as a result of the austerity measures implemented by the Government and subsequent reductions to public sector funding. It is estimated that Wokingham Borough Council will be required to make budget reductions in excess of £20m over the next three years and all Executive decisions should be made in this context.***

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	Nil	Nil	Nil
Next Financial Year (Year 2)	Nil	Nil	Nil
Following Financial Year (Year 3)	Nil	Nil	Nil

<b>Other financial information relevant to the Recommendation/Decision</b>
--

None anticipated
------------------

<b>Cross-Council Implications</b> (how does this decision impact on other Council services, including property and priorities?)
---

A decision by the Ministry of Defence upon the location for the interim storage of intermediate level radioactive waste could affect how the authority needs to resolve impacts on development in the borough together with co-ordination of emergency planning/ community resilience activities within the relevant DEPZ surrounding the AWE facilities at Aldermaston and Burghfield.
---

<b>SUMMARY OF CONSULTATION RESPONSES</b>
--

<b>Director - Resources</b>	No response received
<b>Monitoring Officer</b>	No specific comments (23/1/15)
<b>Leader of the Council</b>	Fine with comments in report (23/1/15)

<b>Reasons for considering the report in Part 2</b>
---

n/a
-----

<b>List of Background Papers</b>
----------------------------------

Information published by the Government on the Submarine Dismantling Project which is available at <a href="https://www.gov.uk/government/consultations/submarine-dismantling-project-site-for-the-interim-storage-of-intermediate-level-radioactive-waste">https://www.gov.uk/government/consultations/submarine-dismantling-project-site-for-the-interim-storage-of-intermediate-level-radioactive-waste</a> . Office for Nuclear Regulation advice available at <a href="http://www.onr.org.uk/cross-onr-programme.htm">http://www.onr.org.uk/cross-onr-programme.htm</a> .
---

<b>Contact</b> Graham Ritchie	<b>Service</b> Development Policy & Planning
<b>Telephone No</b> (0118) 974 6457	<b>Email</b> graham.ritchie@wokingham.gov.uk
<b>Date</b> 23 January 2015	<b>Version No.</b> 2

**Annex G: Feedback Forms**

---

**1. Do you have any comments or views on the proposed RPV storage arrangements?**

RPV is ILW, stored afloat, securely at present, with costly 'maintenance' (every 12 years?). Core materials will be HLW so need much longer-term storage in the GDF which is the wrong way to go for the UK (Finland, France - US, much bigger countries and smaller population).

**2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?**

This seems to be adequately done - there will obviously be disturbance to habitats, visual impact etc - Roads, see no 3, but they're a significant part of the environment.

**3. Do you have any comments or views on transport, regulation or planning issues?**

Transport of RPVs is obviously a challenge at all sites. Here in West Cumbria we are greatly troubled by inadequate roads, and there are currently two major projects planned (new power station and its connection to National Grid). Joined up thinking/planning needed.

**4. What do you think are the main issues that we need to consider with each site?**

1. Who controls it. 2. Proximity to Rosyth and Devonport. 2a. Access ease. 3. Existing ILW storage facility.

**5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

As the sites are existing nuclear installations.

**6. What are your views on our approach to deciding between the shortlisted storage sites?**

Public consultation valid approach, but who did you inform, how did you choose households to write to?

**7. Do you have any comments on the stages that will follow this consultation?**

Interested to know what will be involved in 'follow-up events' local to each of the sites, and why B/ham - Glasgow chosen for 'National Events'.

**8. Do you have any comments about the conduct of this consultation or the information provided?**

Clear boards and booklet; helpful and informed people.

**9. Are there any other comments you would like to make?**

Probably good if we stopped obsessing with a 'nuclear deterrent' and atomic weapons, as we've created enough waste at Intermediate and High Levels already to last us thousands of years.

**Site most interested in**

Sellafield, as it is nearest to where I live, but all of the really.

**1. Do you have any comments or views on the proposed RPV storage arrangements?**

They are well over the top.

**2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?**

The hazards are absolutely minimal.

**3. Do you have any comments or views on transport, regulation or planning issues?**

I see no problems at all.

**4. What do you think are the main issues that we need to consider with each site?**

-

**5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

-

**6. What are your views on our approach to deciding between the shortlisted storage sites?**

The lowest cost (for the UK taxpayer) option should be chosen.

**7. Do you have any comments on the stages that will follow this consultation?**

-

**8. Do you have any comments about the conduct of this consultation or the information provided?**

-

**9. Are there any other comments you would like to make?**

Any of the 5 options will be much better than the status quo. (ie storage in subs afloat).

**Site most interested in**

-

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Not too concerned. We already have a lot of warheads being transported through our area!</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Very informative.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>The roads around here could always do with some improvements.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>None.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>I think it will be forgotten about, if it ever happens.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Very professional.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>All very good.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>I did raise the question of over-flying aircraft, but nobody else seemed to be concerned about it. My point is that we have more aircraft over here than any of the other possible sites.</p>
<p><b>Site of interest</b></p> <p>Both, but I live nearer to Burghfield.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>We were told there will be “minimal or no discharges with no significant effects on local health and wellbeing”. This is to ignore a considerable body of scientific work on the dangers of low-level radiation.</p>
<p><b>Site of interest</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>No. Good that it is done safely.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Good solution to a problem.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Not sure 95-100 tonne lorries are going to help traffic near Burghfield.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Access and volume of traffic to Aldermaston and Burghfield.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Safety - information - consultation.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Good.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Very good.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Though it may seem "not in my backyard" I do think traffic volume and commuters will make Burghfield and Aldermaston difficult choices.</p>
<p><b>Site of interest</b></p> <p>Burghfield</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>They should be as far from high habitation areas as possible.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>The narrow humpback canal bridge at Pingewood would be an obstacle for RPV lorry.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Safety, transport, environment.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Safety, transport, environment - construction traffic.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>I was/am concerned that 'cost' is the first item on the list.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Lots of information.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Visual impact of large shed (Burghfield site). Workshop at Burghfield Common 13.00 hrs 18/11/14 was good and interesting.</p>
<p><b>Site of interest</b></p> <p>Burghfield and Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>No.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Concerns about flood plains, particularly around Burghfield base area.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Concerns regarding local roads being able to cope with increase volume of construction traffic and other vehicles whilst site is in operation.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Transportation.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Disruption, security, local employment, communication.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Pleased with information supplied at public presentation and being given opportunity to comment.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Assume general public will have opportunity to make formal comments as part of planning approval process.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Very impressed with information supplied and put forward.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Need assurances that this a one off facility for storing the 27 RPV identified at this presentation.</p>
<p><b>Site of interest</b></p> <p>AWE AND Burghfield and AWE Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>The process appears rigorous and professional.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>I note that railway bridge for access to AWE Aldermaston is an issue. What about road bridge over Kennet and Avon Canal on Burghfield Road by The Cunning Man for AWE Burghfield?</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>The extent to which the site is already carrying out this type of storage.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Need reassurance of ongoing safety. Employment opportunities.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Seems rigorous and comprehensive.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No, though the fact that the whole process can be de-railed by the planning process.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>No.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>No.</p>
<p><b>Site of interest</b></p> <p>Burghfield</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Store looks well thought out. Need to consider seismic withstand and take into account flood risk - regulators also require global warming impacts on this.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>The posters do not mention airborne discharges. I assume those will be zero - worth saying this?</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Transport to AWE(A) via M4 will be problematic!</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Space, disruption to local area during construction.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Explaining the risks. Managing negative feedback from pressure groups.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Need to be open on the options assessment scoring. Need visibility of 'weighting' factors.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Keep communicating.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>It has been excellent. Thank you for the opportunity to be involved.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Keep the options for final disposal open for as long as possible. Consider size reduction <i>in situ</i>. Explain how the store will be decommissioned at the end of its life.</p>
<p><b>Site most interested in</b></p> <p>Aldermaston and Burghfield</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Minimise distance travelled by road.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Security, cost, access.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Reassurance as to level of risk.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Need reasoned step approach - gradually eliminating less appropriate sites.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>Burghfield resident</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>It seems to me that the issue of population 'density' should be a major consideration.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Transportation should be related to minimising risk, ie staying away from major conurbations.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Population impact in terms of both safety and security.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Safety and security.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Minimal impact per head of population.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>Burghfield and Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>No.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>No.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>David gave me his views which did not raise any issues in my mind.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>There does not appear to be a risk.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Go ahead.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>I am very happy with what was shared with me.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>None.</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>No.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>No.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Would it not be better to spread the risk more widely, by building new facilities where there at present is no nuclear activity? (see below)</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>I appreciate that I am questioning the fundamental assumption that existing nuclear sites should be used. I would like to know, via independent statistics, whether the incidence of cancers/other diseases is actually greater in the vicinity of the current nuclear sites. If it is, I suggest that this risk should not be exacerbated further.</p>
<p><b>Site most interested in</b></p> <p>Aldermaston and Burghfield.</p>

**1. Do you have any comments or views on the proposed RPV storage arrangements?**

I consider the distance from Reading, which is a large population centre, to be an important factor which needs to be considered.

**2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?**

Proximity to a large population centre needs to be taken into account for both safety and environmental reasons.

**3. Do you have any comments or views on transport, regulation or planning issues?**

-

**4. What do you think are the main issues that we need to consider with each site?**

-

**5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

-

**6. What are your views on our approach to deciding between the shortlisted storage sites?**

-

**7. Do you have any comments on the stages that will follow this consultation?**

-

**8. Do you have any comments about the conduct of this consultation or the information provided?**

-

**9. Are there any other comments you would like to make?**

I welcome the consultation process and I hope to see more openness and transparency in future with respect to the activities at AWE sites.

**Site most interested in**

Most concerned about the AWE sites

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Why must it be one large store? 2/3 stores might be easier to manage.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>The AWE/Burghfield sites are in/near large population area - A catastrophic (?) disaster would affect more people.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Taking the cost of each possible solution only makes the project start go further into the future.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p><u>Population</u> (existing or planned) gives more problems with building/transportation to and eventually from the site.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>A deep-rooted fear that the chance in a million accident will occur.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Look for the site with the least population, then dangle a "cost solution" to the local authorities.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No - but keep the start date for the project set in stone.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Make sure all members of the team have read the leaflets available to the public.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Keep going forward.</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b> Can be safely stored and transported.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b> No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b> Transport can be done safety - not really a big issue but public concerns/perceptions.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b> Fit with strategy for site and ILW.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b> Transport, local nuisance issues.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b> OK - must consider cost (I am a taxpayer). Must be acceptable on safety grounds.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b> Need to consider national ILW strategy - concentration on fewer sites.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b> Useful session. A few unfortunate errors, eg transport routes.</p>
<p><b>9. Are there any other comments you would like to make?</b> More effort needs to be put into putting proposals in context, eg existing stored ILW, hazards.</p>
<p><b>Site most interested in</b> Burghfield and Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Transportation is a concern and method of moving RPV does not appear to be known yet.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Safety of staff and residents must be top issue.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>As 4.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Pro.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Clean.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Unlikely to be a problem.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Future expansion of ILW use.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Jobs.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Fine.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Open/clear.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Transport will be main issue.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Roads to the Burghfield site.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Again infrastructure.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Well done.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>Aldermaston and Burghfield.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Pleased to see that a solution to the dismantling has been found. It is important we as a nation deal with legacy waste.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Pleased to see the level of detail included.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Pre-engagement with local authorities regarding planning issues will be crucial.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Planning consent and transport.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Communicating what is going on.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Good approach.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>None.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Very through consultation. Pleased it is being done with local communities.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>AWE Aldermaston and Burghfield</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>The impacts to health/the environment seem to be extremely minimal. Greatest concern would be the noise/visual impact of construction and increased construction traffic.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>There's uncertainty on how long the RPVs will be kept in storage - relying on a GDF that hasn't been built yet.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Emphasising that the RPVs are defuelled and not a large health/security risk will put the public at ease which you did well. Clarifying how planning permission will be granted would be useful.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Ease of access and distance from source. Impact on highways. Flooding/erosion. Cost. Impact on habitats/wildlife. Relationship with surrounding community. Security and strength of management arrangements at the site. Time constraints. Surrounding landscape - if it is flat, noise and visual impact will be more significant.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Road traffic - during construction, transportation of RPV and decommissioning. Noise from construction and visual impact of building. Concern over future - will there be more movements?</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Feel fairly reassured that approach is proportionate against cost/security/safety and environmental impact.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Posters were very informative and clear to understand. SDP representatives were very helpful and approachable. Less formal dress could make you seem more approachable to members of the public - more likely to ask 'silly' questions. Presentation was very useful. Having regulators present reassures people.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Will size reduction create more of a risk/additional traffic/work on site?</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Mark Ball explained everything so clearly and put me at ease fully.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No you seem to have everything covered.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Seriously consider transport by sea, lots of large stuff is already transported by sea on transporters. No need to tranship they come into Ellesmere Port now for Essar (Shell).</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Not to be near main towns and cities.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>To accept it as it has been well looked into. Pity it has to take so long (cost).</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>I agree with the consultation policy.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Just speed things up to lessen the cost.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Excellent.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Bring it to Capenhurst.</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Not now I have been here.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Transportation through Capenhurst village could be interesting.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Transport.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I believe the site at Capenhurst is unsuitable due to proximity of housing/school/proposed housing/road network.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Concerned vessels stored above ground level in 'our building', being radioactive, not securely monitored.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Concerns regarding planning issues, especially new housing estate proposed being a conflict of resources/safety concerns.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>The main reason is Capenhurst is smaller and has a commercial interest, ie the only commercially owned site on list. Other sites much more suitable and more accessible/remote.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Location of vessels to housing, estates/infrastructure/ on site safety and security.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Sellafield is most suitable site - more accessible/larger/remote/not a commercial site therefore not chosen for monetary gain by site.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Should not rush decision - allow longer than mid 2015 - especially as Capenhurst site has a housing development being planned nearby.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>First stage consultation is quite clear and informative, with literature. However, need longer time to consider impact on area as I live very close, also site visit needed.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Would like longer consultation and asked Mr David Slater for site visit for reassurance of plans. Also, local MP and councillors views and Planning Dept involved more.</p>
<p><b>Site most interested in</b></p> <p>Capenhurst</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Submit a planning application to all 5 local authorities as soon as possible and before a decision. Otherwise, to make this work you will just override the council</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>



<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I feel most of the population of Annan is for this facility.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Chapelcross is ideally suited for transport purposes. Planning issues will disappear if SNP Government is defeated.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Quality of the present workforce.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Jobs.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Unfortunately the loudest voices are usually against (empty vessels make most noise).</p>
<p><b>Site most interested in</b></p> <p>Chapelcross</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b> Take it to Westminster.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b> -</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b> 27 opportunities for disaster.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b> -</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b> Living with it and the consequences for successive generations. Also sets a precedent.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b> -</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b> I will fight you forever.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b> -</p>
<p><b>9. Are there any other comments you would like to make?</b> Take it elsewhere.</p>
<p><b>Site most interested in</b> Chapelcross</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I am fundamentally opposed to any nuclear facilities or WMD of anything pertaining to them - particularly in Scotland.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>All very placatory but it still doesn't change my fundamental opposition to it.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>I am resolutely opposed to the movement of any form of nuclear or irradiated materials around the UK.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>You are simply shifting the problem around. I don't feel there are any secure UK geological formations that would make risk-free repositories even.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Stopping it!</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>I don't think you have been transparent enough about it and suspect you will choose the cheapest option.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>I will expect to follow them avidly.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Very slick and friendly - doesn't bely the fact that you need to finds somewhere for potentially lethal waste.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>I wonder why we keep producing nuclear waste when we clearly have no idea what to do with it! I wonder why you are considering building new facilities when you have existing ones available?</p>
<p><b>Site most interested in</b></p> <p>Chapelcross but all of them ultimately</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Coming from a position of opposition to nuclear power in any context I oppose the disposal of ILRW at Chapelcross. However, I appreciate that it has to go somewhere.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>The key issue is missed. Nuclear waste never goes away - we need to stop producing it in the first place.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Wherever is chosen the infrastructure will have to be appropriate to the increased use of transport networks.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>I appreciate the open and consultative process and hope that it is not just token.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>None.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Positive generally.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>As a Scot, I appreciate the Scottish Government's stance as regards Trident.</p>
<p><b>Site most interested in</b></p> <p>-</p>



<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>See 4 below. 20m height = 2-storey house so building is not too high.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Well done. What means of notifying locality other than Reading Chronicle? (Very few people attending). Why not also Reading University?</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Aldermaston and Burghfield are nearest to the submarines. Therefore less transportation risks and costs. Will an element of railway movement be considered? Also flood relief scheme implemented?</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>As outlined, safety, security, environmental. NB incidence discovered 30 years ago of significant cases of leukemia in children in Berkshire and Sellafield areas.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Reassuring Reading Nuclear Awareness Group re (4) above and parish councils locally.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Scottish site will surely be ruled out by SNP. Therefore 4 sites under consideration with Sellafield ultimately taking this material &gt; 2040.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>5-year timetable to 2020 must be adhered to, without slippage occurring, in order to meet your plan.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>See (2) above. Presentation was backed up by many professionals to reinforce information boards.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>See (4) above. AWE say that leukemia case not established but Berkshire Health Authority expressed great concern at that time (5 cases when only 3 statistically expected).</p>
<p><b>Site most interested in</b></p> <p>Aldermaston and Burghfield are 'local'.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Sensible to use sites which already store nuclear material.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>I do not have enough knowledge to comment.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Road transport in Cumbria may present problems. A66 westbound from M6 can be quite narrow in places - see attached comments.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Have only thought about Sellafield - a site which has experience in decommissioning and storing nuclear waste.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Concern about precisely where the RPVs will be stored. Likely to be opposition is storage separate from main Sellafield site.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Have not looked at this.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>By the time any RPVs arrive at Sellafield the new build nuclear plant is likely to have commenced - the electricity pylons are already being planned.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Very thorough. Staff on duty interested to hear the public's comments.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>One RPV a year seems a bit slow. PRISM reactor may be the new variety installed at Sellafield. The local U3A science group had a talk about this recently.</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I believe Burghfield site doesn't currently store any radioactive waste. I think it would make sense to chose a site that does already.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>In an age of ever increased security risks and innovative and determined terrorists, storing radioactive waste on Reading's doorstep seems risky to the lay person.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>I have on many occasions nearly been driven off the road by fast moving HGVs in the Burghfield area. (Demolition lorries.) Bendy roads, blind bends, not ideal for such a large mode of transport.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Safe local access due to comment No 3. Proximity to densely populated areas.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>I don't like the inference of a 'potentially affected community'. The most important issue will be the need for total safety and zero health risks to the community.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>'Open' but it would appear an exercise in 'being transparent'. Due to politics I can't see the Scottish sites as an option, somewhat narrowing the field.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>I would prefer the final decision be made by a panel rather than a Minister, as in my experience ministers seem to follow party lines, not reasoned debate.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Like I said it seems open, but as a father of young children living locally, naturally, I can't see it being anything but negative. Even with 'minimal risk'.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>I appreciate the need for the programme. But I think that a site that already stores radioactive waste, in a more remote location with good road access would suit best (ie, not Burghfield).</p>
<p><b>Site most interested in</b></p> <p>Burghfield.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I attended an excellent presentation and workshop and feel reasonably informed.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Very good information.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Only concern that a new development may be used as an excuse to remove facilities that are valuable to the workforce and community.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Infrastructure, accessibility, security, long term maintainability.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Short term disruption - building work and movement of RPVs.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Cost and suitability of location.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>No, but it does seem that you are forced into excessive processes and cost for something of very low risk.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>I hope that companies that run these sites don't exploit the situation for their profit.</p>
<p><b>Site most interested in</b></p> <p>Aldermaston.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>No.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>No.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>The good name of the local area and associated local asset (housing) values are maintained.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>No.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>There should be a firm commitment to remove the waste by a given date, say 2050. The local community should obtain some advantage such as: new sports centre/playing fields, youth centre, community charge.</p>
<p><b>Site most interested in</b></p> <p>Aldermaston.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Yes.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Yes.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Is the land available?</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>None.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>None.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>There should be <u>no</u> consultation for this disposal.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>No.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Yes. [Paper and letter attached.]</p>
<p><b>Site most interested in</b></p> <p>Sellafield/Drigg.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>If the RPVs are stored on either Aldermaston or Burghfield sites, residential housing is close to both sites. Could have a detrimental effect on house prices. Should be stored on a site away from urban housing.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>To transport the RPVs we will have massive transporters either coming from M4 junction 12 or coming through Tadley. The route from the M4 crosses a couple of bridges. Would there be road developments taking place to cope with the vehicles.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>The visual impact of the storage units, radioactive waste, any potential security risks such as terrorism damage to the site.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Size of the RPV store (3100m<sup>2</sup>) noise levels from the store, levels of radioactivity (ILW); more people employed on site to monitor store. Danger of lightning striking the RPV store.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>I think you have been very thorough and detailed in your analysis of the various sites. I notice on some sites you draw attention to the vibration levels and dust but that has not been allowed for in Aldermaston and the town of Tadley.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>After 2040 when the RPVs are removed what is the future of the storage units. Will they be retained and used for other nuclear waste or will they be demolished.</p>
<p><b>Site most interested in</b></p> <p>Aldermaston/Burghfield</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Arrangements seem robust.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>I am concerned that the Ellesmere Port area might become a waste dumping ground.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Planning approval must be seen to reflect all issues - not just aesthetics.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>The local infrastructure and not least property value perception.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>As above (4).</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Seems OK, so long as a decision is not based on just finances.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Not at this time.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>This workshop was well presented and informative.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Not at this time.</p>
<p><b>Site most interested in</b></p> <p>Capenhurst. Local Resident.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>The case has not been made for one RPV storage site. There is no apparent reason why there cannot be one site in the north and one in the south of the country.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>The location of the GDF is critical for future transport in 30 years time. Why not delay timetable of SDP by a few years? In the meantime dismantle submarines and store ILW in close proximity to dockyards.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Special vehicular access. EA and local government views.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Special vehicular access.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>No emphasis on future transportation in 30-50 years time.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Refer '3' above - delay decision until preferred site of GDF is known.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>No.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>In my view Sellafield should be the preferred site as the future generations will be involved with the massive disposal of nuclear waste from this site. SDP will be a minuscule part of this work and it will be in one place.</p>
<p><b>Site most interested in</b></p> <p>Capenhurst</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>The upgrading of access roads to improve pedestrian/cycling routes around the site to protect local people and enhance the area.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>The road safety for all users of the site and local area.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Very clear detailed information packs and helpful people at the exhibition.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>Capenhurst.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>It seems to be a safe storage space.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Please choose the safest option.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>This would be my main concern - transport and access by road.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Need to have agreement from the community immediately affected.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>As always low visual impact and safety.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>You seem to be fair.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Do nothing in haste!</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>You are open to questions which is good.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>It is essential that the site would be made very secure and that there is no possible chance of corrosion or radiation build-up.</p>
<p><b>Site most interested in</b></p> <p>Chapelcross</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>To use the route from the A450 through Capenhurst Village is not acceptable - the alternative is better if the bridge will take the weight!</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Cannot comment on other sites but access to Capenhurst is not acceptable.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Transporting RPVs via narrow country lanes and into Capenhurst Village.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Error in para 143 (page 31) the road is <u>not</u> the <u>A51</u> it is the A540.</p>
<p><b>Site most interested in</b></p> <p>Capenhurst</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>You make no comment on the core barrel. Will it be highly activated? Will it be removed prior to storage of the RPV and if so where?</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>No.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>The 'storage footprint' you show, and the site plans are too small to judge the impact on space requirements. What service roads, infrastructure etc will be needed within and external to th storage area.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Sellafield:</p> <ol style="list-style-type: none"><li>1. Conflict with the planned construction of the new nuclear power station.</li><li>2. Competition for space on an extremely crowded site.</li><li>3. Possible disruption to important decommissioning programme.</li></ol>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Your approach must consider the overall community benefit and not be based on minimum cost to MOD. Whatever site is chosen, a clear, binding commitment to eventual disposal needs to be given, backed up legally.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>The site must not be viewed by MOD as a convenient 'fit and forget' option. You will need to build up trust with the local community and not simply rely on assumed acceptance.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>It has been good.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>As someone technically interested, you give virtually no information on effective half lives, potential contaminants, etc.</p>
<p><b>Site most interested in</b></p> <p>Sellafield</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b> Will the stores be accessible for future research? Eg materials or radiological research on the RPVs?</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b> Will the supply chain for the rest of the sub materials be transparent? ie publically available and traceable.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b> Every stage of the process is important in creating awareness and visibility of the nuclear economy.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b> Security, access, safety, experience of handling radioactive materials. National jurisdiction (eg, Scotland).</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b> Road blockage, local stigma, rebranding of 'nuclear' village names always a problem.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b> You could add ethics and responsibility: AWE Aldermaston and Sellafield create nuclear materials and have a responsibility to look after nuclear waste.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b> Where will the archives of this project, and the storage sties, be kept for future generations?</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b> Very thorough. The project could include art projects.</p>
<p><b>9. Are there any other comments you would like to make?</b> What are the long term plans for interim storage if the GDF is never built, or is built but fills up fast?</p>
<p><b>Site most interested in</b> Aldermaston/Burghfield</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>We had to suffer Chapelcross Power Station for 60 years. Give this area a break we've suffered enough. Large clusters of people die from cancer in area. Dumfriesshire is a beautiful unspoiled area.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Chapelcross is already highly tritium polluted. Therefore getting into waterways and surrounding ground.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Chapelcross would be far better concentrating on conversion to renewable energy store being connected to National Grid already <u>not</u> a nuclear storage store Phase 1, <u>Phase 2</u>?</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Effect on surrounding area. Bad for tourism, bad for house prices, bad for people moving into area. Poor stigma attached for Annandale detrimental to Annan.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Poor community! Scotland doesn't want nuclear. A big step backward for Annandale. Independence for Scotland NO nuclear.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Why don't you find storage on an empty island no issues other than military guard.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Frightening. MOD usually does what it wants. British Nuclear does not enhance itself from a neighbourly point of view.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>V good. But very one sided.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>We live in a great place now don't spoil it by taking a step backwards as it would be for Annandale.</p>
<p><b>Site most interested in</b></p> <p>Chapelcross</p>

**1. Do you have any comments or views on the proposed RPV storage arrangements?**

The presentation is good, and the public do understand that this waste exists, must be dealt with, and has to go somewhere. Also that if kept safely, and relatively temporarily, it is relatively harmless. However, it is not risk-free, hence the need to consult the public. I was therefore surprised to learn from the MoD staff I spoke to, that the SDP process is unconnected with other MoD issues. As far as we in the Aldermaston area are concerned, what happens about reviewing Trident is connected. We are being asked to comment on the SDP proposals as if whether we get the consequences of renewed warhead manufacture here waste and radioactive discharges - is irrelevant. But to us it is relevant, especially, as procurement for Trident replacement has already started. We won't be consulted about Trident replacement effects on the local community so it is the SDP waste which should be factoring in the additional public risk burden for the Aldermaston site. This has not happened.

**2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?**

-

**3. Do you have any comments or views on transport, regulation or planning issues?**

-

**4. What do you think are the main issues that we need to consider with each site?**

Risk to the public.

**5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

-

**6. What are your views on our approach to deciding between the shortlisted storage sites?**

-

**7. Do you have any comments on the stages that will follow this consultation?**

See 1 above.

**8. Do you have any comments about the conduct of this consultation or the information provided?**

-

**9. Are there any other comments you would like to make?**

See 1 above.

**Site most interested in**

Aldermaston

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>They are ugly and should be camouflaged.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>There are narrow humped bridges over the railway, the Kennet and the canal. Unsuitable for your huge transporters.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Nice to be consulted, but will you take any notice?</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>I recommend Sellafield as it's well away from people's homes. The RPVs could go by sea.</p>
<p><b>Site most interested in</b></p> <p>Aldermaston/ Burghfield</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Only as detailed below.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Only as detailed below.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>No.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <ol style="list-style-type: none"><li>1. Total mileage from present submarine locations, possibly discounted by time to journey.</li><li>2. Forecast climate change and higher flooding levels.</li><li>3. Chapelcross is inappropriate because Scotland has many anti-nuclear inhabitants and may leave the UK within 40 years.</li></ol>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Heavy lorries on local roads, especially during the construction phase.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>OK as far as I know, but I don't know the evidence and process by which the next 100 years of the proposed sites was forecast.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>The 3pm presentation on Thursday 20 November at AWE Community Sports Association was well conducted, with a useful Q&amp;A session. I faulted one of the displays in the static exhibition for use of RPV without definition.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>I understand that AWE Aldermaston gives minimum total distance travelled by RPVs. AWE Burghfield is lower and close to an area that floods regularly. 100 years of climate change may turn the site into an intermittent lake needing defences and pumping to keep dry. I much prefer Aldermaston, which already stores ILW.</p>
<p><b>Site most interested in</b></p> <p>Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Cost minimisation should be a prime consideration. Therefore use of existing storage facilities (capacity permitting) preferable to crating new sites.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>SEA focus on significant environmental effects is short-sighted, ignores precautionary principle and needs to consider possible interaction with future proposals/possibilities in vicinity, eg fracking.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Rail transport, available to existing storage sites, preferable to road transport.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Aldermaston/Burghfield – other central government demands seeking release of land in West Berks for housing, etc, consequences for water supply (radioactive leakage to watercourses not unknown from these sites).</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Local disturbance associated with any construction activity where additional facilities required.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Not clear how Investment Appraisal, Operational Effectiveness, SEA and Other Contributory Factors will be weighted in final evaluation and how these weightings will reflect majority consultation views.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Have to live with current legislative framework, despite its shortcomings!</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>MOD approach can be applauded: range and quality of information provided commendable. But what weight will be given to majority views/opinions emanating from consultation process?</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>From outset commitment to a nuclear pathway never adequately addressed problems of long-term waste disposal. Now it is an inter-generational issue, still not fully recognised because of political short-termism!</p>
<p><b>Site most interested in</b></p> <p>Aldermaston and Burghfield</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Yes – we do not want nuclear waste.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>The above can never be environmentally acceptable.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Those who do not want to live in proximity to nuclear waste.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Whoever is near to it!</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Scotland has made it clear we do not want nuclear in any form.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Email responses should have been accepted.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Not acceptable to have waste in this area.</p>
<p><b>Site most interested in</b></p> <p>Chapelcross</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Capenhurst looks like a good choice... expertise on site and carries out similar work already.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>To ensure safety on narrow roads when low-loader trucks are on the move, taking up both sides of the carriageway.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Keep visual intrusion to a minimum: fast-growing trees to hide the building. Appropriate building colours.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>None. Should not affect apart from low-loader truck movements. Construction traffic would be same as for any building project.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Absolutely correct.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Superb.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Highly professional and helpful consultation team. Supremely patient. Clear presentation. Spot on.</p>
<p><b>Site most interested in</b></p> <p>Capenhurst</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Chapelcross is inherently unsuitable (1) because we were told that it was being run down with only necessary storage – this proposal means expansion and is not acceptable. (2) It would <u>never</u> get planning permission.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>It would have a disproportionate impact on a small rural community – with no concomitant benefits in terms of jobs.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Small, poorly maintained, windy rural roads – not suitable.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Will you get planning permission? Environmental issues.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Safety. Jobs. Environment.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>I think you've already made your mind up.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Why no online response possible – in this day and age that's the way to go. Not everyone who's interested (especially those in rural areas) is able to go along to open days. And your online documentation isn't easy to access – especially this page. And an online consultation would save you having to decipher my writing – you are doing that aren't you?</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>People in communities are only interested in their local site – and this needs to be reflected in consultation approach. Different for large (well funded) interest groups.</p>
<p><b>Site most interested in</b></p> <p>Chapelcross</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b> AWE Aldermaston appears to be an appropriate site for RPV storage.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b> We believe AWE Aldermaston has the expertise to deal with this.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b> Concerned about the impact on local roads.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b> AWE security and site capacity to build this facility.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b> Managing the public perception of any potential downsides.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b> Appears to be very thorough and professional.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b> No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b> Clear, professional and wide reaching.</p>
<p><b>9. Are there any other comments you would like to make?</b> Wish to be kept informed of the progress of the project.</p>
<p><b>Site most interested in</b> Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>No - options stated seem reasonable. Sellafield could do it.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Planning appears tricky for non-waste sites (Burghfield).</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>No major safety issues. Local planning etc.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Disruption during build and operations.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Looks good.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>No.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>No.</p>
<p><b>Site most interested in</b></p> <p>Sellafield Ltd.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Needs doing.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I would welcome the ILW storage facility in West Cumbria given that the socio-economic, security and safety assessments are comprehensive and provide benefit to local economy.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>I feel in general that the SEA slightly plays down the risks to environment in the interests of selling it I suppose.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Any planning permissions should include socio-economic issues. Particular attention to security during transport given current terrorist activities in UK.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Experience gained in the nuclear industry in West Cumbria makes it the ideal site.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>What's in it for us?</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>LLW site at Drigg should be included (see below).</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Final disposal to geological site should take into consideration the possible EA pressure to enhance open trench tip at LLW, and kill two birds with one stone, possibly.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Happy with the way info was presented, by well informed people.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>I feel that further decontamination could be attempted to reduce levels or at least definitively prove that further decontamination is not possible (ie bring down to LLW or VLLW).</p>
<p><b>Site most interested in</b></p> <p>Sellafield and LLW Site</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>No.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Seems to have taken a long time to get to this stage.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>No.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Institutional capacity to manage ILW.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Jobs v blight.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>See criteria given in 4 and 5 above.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Make it quicker.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Very good.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Main issue seems to be the dismantling phase but this is not addressed above.</p> <p>Preserve a sub (eg HMS Conqueror) to aid connection of society to the nuclear sub programme.</p>
<p><b>Site most interested in</b></p> <p>Sellafield.</p>

**1. Do you have any comments or views on the proposed RPV storage arrangements?**

Idea 1: There is a strategic imperative for Sellafield Ltd to retain nuclear skills and knowledge in light of competition from new build - why not use this as a showcase project at Sellafield to help retain skills? Would be fantastic PR opportunity, ie a graduate project.

Idea 2: I believe there are many more opportunities for synergies between SL and MOD - these need working through now.

Idea 3: 3<sup>rd</sup> party (MOD) or private company or NNL to deliver the project on the Sellafield Ltd site.

**2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?**

-

**3. Do you have any comments or views on transport, regulation or planning issues?**

-

**4. What do you think are the main issues that we need to consider with each site?**

-

**5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

-

**6. What are your views on our approach to deciding between the shortlisted storage sites?**

-

**7. Do you have any comments on the stages that will follow this consultation?**

-

**8. Do you have any comments about the conduct of this consultation or the information provided?**

-

**9. Are there any other comments you would like to make?**

-

**Site most interested in**

Sellafield

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Sellafield or any sea-based site. Sellafield has the facility but is seriously neglected.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Why bury the waste? Reuse it for power generation.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>See below.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>There is already a nuclear waste loading/unloading facility at Barrow dock, but the Barrow/Sellafield road needs considerable improvement and duelling.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Approach is OK.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>None.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Well conducted.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>Sellafield</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>The need to store the 'unusable' sections in as small a container as possible.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>There needs to be an area consideration as well as a site-specific assessment. Some suitable sites may not really be suitable given local area considerations.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>The size of the transporters will clearly cause problems on many smaller roads. Cumbria 'A' road classification is not what other areas of the country expect!</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Access both for transporting building materials, nuclear materials. Service staff and vehicles, safety record of site.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Are local infrastructures adequate to meet the needs of the storage facility.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>There must be analysis and comparisons done. No site will fulfil all needs but to find a 'best fit' will need more details than are currently available.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Display boards and helpful staff were good.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>There is an anxiety about ultimate control of the site. Private contractors, responsible to shareholders, may well have a different set of pressures than the local/national community.</p>
<p><b>Site most interested in</b></p> <p>Nearest to Sellafield, but interested in the other sites.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Road transport problems, size and weight.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Sellafield busy site, they appear to have problems with their own disposal/dismantle time scales. (Size of site etc)?</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Security, roads and rail links. Suitability?</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Think Drigg site should be listed.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Definite date for dep storage solution should be given.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Should have been sorted several decades ago!</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I do not have the background to comment sensibly.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Why is distance of transport needed regarded as important?</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Surely safety and ease of transport are the key transport parameters.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Safety, ease of access, the attitude of vociferous members of the local population.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>The local economy and safety.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>It's not very clear what the approach will be!</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Is there a risk of 'political' manipulation?</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>I am impressed.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>It should be stressed this is a separate project/issue from movement and storage of nuclear power station residue.</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>No.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Will it affect the residents.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Experience.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites</b></p> <p>Very good.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>No.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>No.</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p>
<p><b>9. Are there any other comments you would like to make?</b></p>



<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Yes - it should not be stored at Chapelcross or Sellafield.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>The Strategic Environmental Assessment is wrong. No one knows the dangers for the future.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>I do not want this waste material travelling in our area.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>The cancer risk.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>High cancer rate in area in the future.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>You are going through the motions before deciding on Chapelcross or Sellafield.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Yes it will be decided between the above two.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>It will be as far from the Thames as possible.</p>
<p><b>Site most interested in</b></p> <p>Chapelcross and Sellafield</p>

**1. Do you have any comments or views on the proposed RPV storage arrangements?**

No nuclear waste is ever safely or completely disposed of, it remains a danger for ever.

**2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?**

I don't believe you can say there is no risk, if there was no risk you would put it in a normal warehouse.

**3. Do you have any comments or views on transport, regulation or planning issues?**

I have many concerns on transport. Nuclear material was moved by road this week in one of the worst storms in recent years.

**4. What do you think are the main issues that we need to consider with each site?**

The wishes of the people of the country you are planning on dumping it in. No nuclear waste is safe waste.

**5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

Terrorist threat, environmental damage and waste land. Potential of the site being reclassified to take more waste.

**6. What are your views on our approach to deciding between the shortlisted storage sites?**

I think it's probably decided by now. You must take the views of the locals on board and not keep it out of the south of England.

**7. Do you have any comments on the stages that will follow this consultation?**

What are the stages? How will we be informed? Just more propaganda and lies fed to us to appease the USA.

**8. Do you have any comments about the conduct of this consultation or the information provided?**

Big glossy posters don't say anything much at all. No real answers lots of if/ buts and that's not decided yet.

**9. Are there any other comments you would like to make?**

We should stop producing waste through the nuclear energy industry and weapons. Scotland has chosen to be nuclear free and Westminster should respect that.

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I absolutely oppose the use of Chapelcross for this purpose. We have enough of a legacy to clear up already, we don't need any more.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>The SEA may well point to minimal environmental impact due to radiation. That may be the case as long as everything is contained, but what if something goes wrong? Also we've had this problem on our doorstep for the past x years. We don't want to encourage more.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Containing the radiation and making sure <u>nothing</u> goes wrong. It is the principal of the UK having this waste anyway that's the issue, not the sites themselves.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Protection against radiation first and foremost. The health of those employed is important too. Something going wrong too. Also - house prices, attractiveness of area to live.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>The public consultations weren't well publicised. I only found out on the night. It's being run by the SDP who have a vested interest - should have been carried out by independent body.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>I hope I can trust that my views, and those of my community will be represented truly by the SDP.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>As 7. Don't entirely trust that my views will be properly represented by a body proposing the motion.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>I feel very strongly that Chapelcross should not be the site to handle this waste.</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Yes, 60 years of Chapelcross is enough.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Where the sun does not shine.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Intend to leave the area.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>No.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Nobody dies of old age in Annan any more, just with cancer.</p>
<p><b>Site most interested in</b></p> <p>Chapelcross</p>

**1. Do you have any comments or views on the proposed RPV storage arrangements?**

The local community doesn't want it here. It is not safe, even in a concrete bunker.

**2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?**

The decision for the depository should be brought forward and it should go there. If you are going to save money why build this and then move it.

**3. Do you have any comments or views on transport, regulation or planning issues?**

The roads aren't good enough, hump back bridges and windy country roads.

**4. What do you think are the main issues that we need to consider with each site?**

Scotland wants to be nuclear free, we have had the jobs from Chapelcross, which are going but we will have to keep what is there. There should be nothing brought in. The electricity generated wasn't used locally.

**5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

We will feel that we are a dumping ground, it is the thin end of the wedge. Once it is started we will end up with the Trident sub waste too.

**6. What are your views on our approach to deciding between the shortlisted storage sites?**

Ultimately it is the Secretary of State that will make a decision based on which site will be the least hassle for him politically. There should be a committee siting in open session.

**7. Do you have any comments on the stages that will follow this consultation?**

No, I think it will be a political decision in the end.

**8. Do you have any comments about the conduct of this consultation or the information provided?**

No, I think the personnel involved are open and honest but it doesn't matter as - see 6 and 7 above.

**9. Are there any other comments you would like to make?**

Refer to 2: get the depository built/dug and move it there or even better move it to America where it came from. Did we not lease the missiles from them anyway.

**Site most interested in**

Chapelcross

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>None to speak of.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No, these things have to go somewhere.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Aldermaston and Burghfield would be tricky from the A4 end, M3 would be better.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>None really.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Possibly leakage but they will complain anyway!</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>I'm surprised you have consulted. Back in the day you wouldn't have bothered.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Very professional.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>I'll be dead before the project finishes!</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>It would be helpful to have information on the impact on me of the ILW, i.e. comparison between x-ray, holiday in Cornwall etc - a scale where I could use my judgement to assess risk.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Seems very thorough, given that the fissile material is at Sellafield.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Burghfield - must be outside high flood risk area.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Cost does not feature in materials, but if safety profile is similar this should be next consideration.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Needs more local publicity.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Well thought out.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>For Aldermaston access is a problem. Aldermaston Wharf etc from A4</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Access and impact to traffic.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>A wide selection.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Clear, well presented.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>



<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Have been told that the storage of RPV is not dangerous, however there must be a statistical percentage of danger in your risk assessments and we would like to know what it is.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Please keep checking this on a regular basis, we care about our environment. If Aldermaston is chosen how much of Grimms Bank will be affected and will it be completely protected.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Very worrying.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Safety.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Safety, disruption, security.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Needs external people from all walks of life, so that the decision is made having considered all areas, options, alternative views.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>If there were an accident at any of the sites like Aldermaston, for example, that were nothing to do with the sub waste, would one site cope better than this than another.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Please take into account the huge fuel depot/storage of aviation fuel held at Padworth (right next door to AWE Aldermaston which recently had a high security alert, due to suspicious items and the 'bomb squad' was called out.</p> <p>NB. Concern that alternatives to powering subs with nuclear energy are not being sought, investigated by scientists so that we do not have this problem in the future.</p>
<p><b>Site most interested in</b></p> <p>Burghfield/Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Aldermaston looks like the logical place.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>A bit overkill compared to the actual risk.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Well practised now between Burghfield/ N London.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>See 1.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>No problems foreseen.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>See 1.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>See 2.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>No.</p>
<p><b>Site most interested in</b></p> <p>Aldermaston</p>



**1. Do you have any comments or views on the proposed RPV storage arrangements?**

It's about time public and politicians made real progress in long term RA waste disposal. I would like under sea disposal when tectonic plates are going down: taking the waste with it for geological time and dilution.

**2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?**

-

**3. Do you have any comments or views on transport, regulation or planning issues?**

-

**4. What do you think are the main issues that we need to consider with each site?**

Satisfying real and imagined concern for long term storage.

**5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

Property values and jobs.

**6. What are your views on our approach to deciding between the shortlisted storage sites?**

We can't expect something for nothing and short term facilities should be reduced or avoided.

**7. Do you have any comments on the stages that will follow this consultation?**

-

**8. Do you have any comments about the conduct of this consultation or the information provided?**

Very efficient.

**9. Are there any other comments you would like to make?**

-

**Site most interested in**

Aldermaston. We live close by and don't want contamination or the value of our houses reduced.

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Safety at all cost.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>We do not want a repeat of the Blue Circle situation.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Local road network under funded by government cut backs, ie Local area is grid locked by current AWE employees, all driving to work in private cars and vans.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Safety of raw materials in transit and final handling</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>MOD information to local residents about what is happening, as soon as possible.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Should be a MOD site.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Freedom of information, ie keeping everyone informed who lives in the local area.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>The mail shot should have been sent out to a larger radius of home owners.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Why did the MOD close down the coach and bus service for employees, false money savings. We now have 9,000 employees who now drive to work in cars, blocking up our local road networks.</p>
<p><b>Site most interested in</b></p> <p>Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>The building (stone) does not appear to be suitable to endure for 100 years despite maintenance.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No, appears more than adequate.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>No.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Should be on MOD run site.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>The new storage facility is not an eyesore and for security reasons be in/near the centre of the site.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Well thought out.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Adequate.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Only UK (Royal Navy) submarines will be considered. All other navies' vessels to be disposed by their own countries.</p>
<p><b>Site most interested in</b></p> <p>Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I can't imagine that off the street comments will make any difference to the final decision. I would prefer competent professionals, with each area fairly represented, to make a negotiated decision on my behalf.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>How much is this exercise costing and who pays?</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Transport arrangement and susceptibility to terrorist attack (shared charge – dirty bomb scenario)</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Security arrangements for transport and storage container design includes stand off protection – shared charge.</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Presentation of material has answered my concerns fully. The proposed arrangements seem to fully meet requirements and satisfy me.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Safety and visual impact. Security.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Visual impact, road changes.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Appears well thought out.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Excellent presentation and workshop session.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>No.</p>
<p><b>Site most interested in</b></p> <p>Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Would there be any benefit in airlifting the RPVs.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Happy so far.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>No.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>A spur road off the M4 to Burghfield might be better for security.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Physical security whilst maintaining community updates/ info.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Information sufficient.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Very good</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>No</p>
<p><b>Site most interested in</b></p> <p>Both [Aldermaston and Burghfield]</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Climate change.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Canals and small bridges around AWE.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Management records - climate change.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>The fact that it will end up being ongoing into the future.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Very good.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Has to be done.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Security and land availability <u>not</u> encroaching on the community.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Disruption to residents through demonstrations.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>My view is that I would prefer on MOD site - not in commercial company.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>None.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Hope there will be a plan to protect surrounding (inside and outside AWE sites) sites of scientific or historic value during and after construction.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>That local businesses will be invited to tender for construction process.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Long term funding to maintain level of safety and security desired by the plan and for regular review of its continued relevance to any future changes in the threat to safety and security.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Long term safety and security of site. Appropriate traffic flow management to mitigate negative impact to local traffic.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Approach seems fair.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Approach seems fair.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Well presented.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>As described they appear to be adequate.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>You need to plan for a much later start to the geological repository than 2040 and possible climate change effects in that time, esp. flooding.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>You might do well here with the 'mars bar' design building because it looks a bit like the Orion laser building already here! (AWE Aldermaston).</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Flooding. Area available (having to extend the site will increase your problems).</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Disturbance during construction; transport of the vessels; visual appearance of the building.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>I've a nasty feeling the final decision will be political and not well founded on evidence.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Are you prepared for a delay at the point when you have got the vessel out of the submarine and are about to transport it? (This is all like the "chain" in selling / buying a house!).</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>A little concerned that you are not able to formulate responses to the bigger picture, outside government policy, e.g. Scottish independence, long delays in finding/ building geological disposal site.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Very grateful for one to one talk with one of the SDP team on various issues, esp. geological disposal.</p>
<p><b>Site most interested in</b></p> <p>AWE sites</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>It is notable that this process is taking place without knowing where geological storage site will be. This is problematic.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Does carbon calculation include use of concrete?</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>The long term responsibility for the chosen site. Is it better to use government owned site or contractor run site.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Local consultation is important and maximum openness whenever possible.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>Sellafield</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Happy to have storage at Aldermaston.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>No.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Safe storage.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Any leakage of harmful materials/gases</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Very good.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Very well done.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Enjoyed the opportunity to be involved.</p>
<p><b>Site most interested in</b></p> <p>Aldermaston</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Yes.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>No.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>One facility is privately owned. How can a private company give assurances over a 100 year period? At least a government agency is in the end controlled by the state.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Plans sound excellent and sensible.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Wouldn't have thought would be a problem in existing nuclear licensed sites!</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Reassure that nothing drastically different will happen - they are all <u>already</u> nuclear licensed sites!</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Good communication!</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Very hard - as they're much of a muchness. Issue about Scottish politics makes Chapelcross a risk.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Excellent. Good clear information</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>The workshop was super - although the temptation of the presenters was to revert to MOD/nuclear jargon and acronyms.</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Happy for it to be in AWE. I see Chapelcross as a non starter with the SNP still aiming at independence.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>With it being ILW - I see negligible risk and zero terrorist attraction. Flooding at Burghfield. Otherwise construction issues are very minor in view of other local construction.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>For the few occasions this is really a non issue.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>SNP for Chapelcross. Ongoing activity or perhaps non activity at Capenhurst.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Getting planning.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Very thorough.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>The MOD has been particularly open - perhaps over the top.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Very open.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Good to deal with them rather than the Russian rusting approach.</p>
<p><b>Site most interested in</b></p> <p>AWE</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Not here. Not now. Not ever.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>See above. No!</p>
<p><b>Site most interested in</b></p> <p>Chapelcross</p>

**1. Do you have any comments or views on the proposed RPV storage arrangements?**

Questions not answered - Statement provided.

Totally in agreement with this system and what has been presented. And very much in favour of Chapelcross being chosen. I don't see problems apart from a possible political one at the moment. It will enhance and assist the area. Hard working people in area, but not rich and this could help enhance it. And finally I hope they do choose Chapelcross.

**2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?**

-

**3. Do you have any comments or views on transport, regulation or planning issues?**

-

**4. What do you think are the main issues that we need to consider with each site?**

-

**5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

-

**6. What are your views on our approach to deciding between the shortlisted storage sites?**

-

**7. Do you have any comments on the stages that will follow this consultation?**

-

**8. Do you have any comments about the conduct of this consultation or the information provided?**

-

**9. Are there any other comments you would like to make?**

-

**Site most interested in**

Chapelcross

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Believe it should be stored close to removal from subs until permanent storage is complete.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>All rad waste should be subject to shortest and safest route possible, including double handling.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Distance to sub dismantling and eventual permanent storage.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Public and media conception! Sound very little benefits after construction, very few local jobs.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Expensive public consultation process. Otherwise very good information, well presented, with friendly and informed personnel.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Press gave impression HLW was involved (ie core, rods, fuel etc) Not ILW. My concern would be to the area is affected by the fact or fiction.</p>
<p><b>Site most interested in</b></p> <p>Chapelcross</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I support your proposed arrangements.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>I am convinced that the impact will be minimal.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>No significant concerns.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>The relative impact on the area.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Timescales for operations to build the store.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Good logical reasoning.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>None.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Good. High input from you.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Good luck.</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Yes. We disagree with proposals to bring this to Chapelcross.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>We were expecting decommissioning at Chapelcross to continue, to the point that we would return, in time, to 'greenfield' environment.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Once planning permission has been given it opens the door to further storage facilities in the future. The less distance this material is travelled the better. Also, is there not a cost implication? Further to travel.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>At Chapelcross site there are emotional considerations linked to the Lockerbie bombing. We witnessed the explosion and initially thought that Chapelcross had blown up – we are relieved that at last decommissioning has started and fear that storage will increase the lifespan of Chapelcross.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Safety and environmental issues. Assurance that further waste from other sources will not come to Chapelcross.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>We worry that local politicians – many of whom are working/have worked at Chapelcross – will not judge this in an entirely unbiased way. We welcome consultation but fear local apathy.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Don't yet know what these are.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>This appears to be open and have a genuine desire to listen. All the information we requested was provided.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Yes – we think that a logical storage place is Aldermaston. This type of waste is already stored here and plans to expand/build more storage are already in place for the distant future. Surely it would be more efficient and less costly to use an existing facility close to where the majority of the waste is currently being held.</p> <p>Whilst we accept that it is good practice to store locally produced waste on site we do not want that facility (and planning permission) to be extended to include waste from elsewhere and do not want it transported on public roads.</p>
<p><b>Site most interested in</b></p> <p>Chapelcross</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Yes.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>How difficult will it be to get planning in Scotland.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Safety.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Safety.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>None.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>No.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>No.</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>It has already been decided that Scotland will be England's dumping ground!</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Safety!</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Already been chosen.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>How much will it all cost?</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Get rid. No nuclear in Scotland.</p>
<p><b>Site most interested in</b></p> <p>Annan (Chapelcross)</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Yes – it is not wanted in this area.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>The scheme equates to a graveyard nuclear waste dumping ground. Own local environment has already been negatively impacted by MOD – Solway depleted uranium.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Very concerned about transport. Fleet used currently is more than a decade old. Regulation is not robust enough. Consultation was NOT well publicised.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <ol style="list-style-type: none"><li>1. No jobs will be created with this scheme.</li><li>2. This site is planned for decommission/clean up - this reverses any gains.</li></ol>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <ol style="list-style-type: none"><li>1. A working site ready prepared to take waste should be 1<sup>st</sup> choice</li><li>2. Safety – including current environment status.</li></ol>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <ol style="list-style-type: none"><li>1. I believe that fair share is important - and Scotland already has surpassed this by new scheme at Faslane.</li></ol>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Needs to be far better publicised than this consultation was. The public must be fully engaged and involved and their views taken on board. I don't have faith it will happen.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <ol style="list-style-type: none"><li>1. Physical accessibility – No lift available for people with mobility impairments.</li><li>2. Must do better publicising activities.</li></ol>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>This project is not a good choice. The proximity to population, environmental impact and status of decommissioning work should be paramount in site choice. This is not a working site, there is no jobs benefit. No positives.</p>
<p><b>Site most interested in</b></p> <p>Sellafield is best choice.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>-</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>-</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Please look at fracking issue in all areas – we have started in Dumfries and Galloway.</p>
<p><b>Site most interested in</b></p> <p>-</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I feel that we should look at the waste - but not the continued making of weapons of mass murder.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Chapelcross is a unsuitable and the local environment.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>I do not like or want waste on our roads – anyway not just Scotland – the risk is too high – Accidents that happen and one will.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Security and environment</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Safety – Health – Future.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>A PA Stunt</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>A PA Stunt</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>None.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>None. Because listened to.</p>
<p><b>Site most interested in</b></p> <p>Chapelcross</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Chapelcross is not the right site for this proposed plan.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Dumfries and Galloway already has depleted uranium in the Solway Firth. A further nuclear waste dump would be an unfair imposition on us.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Current transportation between Aldermaston and Faslane is secretive. Rail is not an option. All road routes represent a danger to the public.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Chapelcross is currently designated for decommission and clean-up. This plan would reverse that process.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>1. Safety, safety, safety. 2. Environmental impact. 3. Nature of proposed site's current operations.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>The technical decisions are logical, but the human and political decisions are far more complex. Scotland wishes (by a substantial majority) not to have nuclear weapons, so, it should not be expected to deal with radioactive waste from military ordnance in any form.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>It was not well publicised. There was no access for physically disabled people (lift was not accessible).</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>There will be continuing strong opposition to this proposal locally, and we will be actively involved in that.</p>
<p><b>Site most interested in</b></p> <p>Chapelcross</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I am totally against this proposal.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Nuclear waste should be dumped closest to the sites that produced them.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>No to have it near Annan.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Safety and if it is going to be safe put it in the Isle of Dogs.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>None.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>None.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>None.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>The Scottish Parliament is aiming to make Scotland nuclear free, take your dump elsewhere.</p>
<p><b>Site most interested in</b></p> <p>-</p>

**1. Do you have any comments or views on the proposed RPV storage arrangements?**

Vagaries of fortune! I appreciate your good faith, your technology and processes of advanced engineering and ingenuity and your honourable aims, given this waste has to be dealt with, but it is immoral to contain horrors of this magnitude underground, given the vagaries of the human existence.

**2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?**

Burghfield's 'high flood risk' is identified but dismissed as a problem in relation to 'significant' parts of the site. The area across the flood plane is, in fact, extensive and roads and fields are swamped for short periods constantly in rainy seasons and it seems disingenuous to even consider burying nuclear waste in a 'watery grave' area where the substrata soil etc may move.

**3. Do you have any comments or views on transport, regulation or planning issues?**

Yes. I will watch what you do as it impacts on our area if you choose AWE, and let you know in detail, but this noxious substance is 'unregulatable' in my view, and transporting it is abhorrent if it can in any way cause harm of a 'crisis-stage level' (but your lorry is too big anyway to be safe) and planning is forced upon you by its existence, but it should not exist.

**4. What do you think are the main issues that we need to consider with each site?**

Protection by MOD is much preferred, I believe, as committed terrorists (e.g. September 11 2001, 7/7) usually achieve their aims and these sites may attract bombers, whether or not this is with serious consequences in your view, it is a 'media-coup'. The main issues generally revolve around safety, as well as this can be managed, given the noxious nature of your 'product'.

**5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

To monitor the impact (if any) of the storage of ILW and reassure/ protect the population, particularly pregnant/ mothers and children. To ensure safety is paramount also in the transport of the ILW. To ensure no water courses are affected (or soil) and check local water or brooks/ rivers etc. To protect sites from attack, real and 'propaganda' based, not ruling out 'disaster' scenarios. To ensure clean-up of any site is thorough and effective (viz Pangbourne pipeline).

**6. What are your views on our approach to deciding between the shortlisted storage sites?**

Perhaps use most-messed up already to mess up further, ideally with least impact on settlements and water courses with zero-risk in transport, so checking all roads and bridges (Kennet and Avon canal bridge on A340 is insecure, in my view, for example and Burghfield bridge on Reading Road may prove difficult, for extraordinary vehicle planned for transport. Keep all nuclear waste together so far as possible, if nuclear weapons cease will be cheaper to have fewer sites.

**7. Do you have any comments on the stages that will follow this consultation?**

Consider seriously whether the 'nuclear deterrent' is worthwhile for the future, given the environmental consequences and the disaster for humanity/war crime of using a weapon of mass destruction anyway [ignoring its (to me, a highly qualified lawyer) illegality if you continue so to do]. Remember Geoff Hoon, Minister of Defence at the time, threatened to use it if our troops were attacked, so if it exists at all, 'deterrent' is incorrect.

**8. Do you have any comments about the conduct of this consultation or the information provided?**

I was delighted so many helpful MOD experts gave me so much time, and information. Thank you. I will peruse the information further and may return in January if anything profound strikes me.

**9. Are there any other comments you would like to make?**

At AWE, I have experienced misuse by ex-employees/employees of nuclear/radioactive products. Protection from errant employees is vital for radioactive substance abuse to cease, although the MOD have today illustrated to me that with submarine dismantling and consequent ILW this is unlikely to be a big issue, given the size of the containers (contents 'solid').

**Site most interested in**

AWE

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Increased risk of radiation, when radon is already present in area.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>-</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Increased traffic and risk of accidents. Terrorist impact during transport. Road infrastructure not great and better transport links to the sites.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>-</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>-</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>-</p>



<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>No. They seem adequate for purpose.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>It would seem logical to reduce transport to a minimum. RPVs could be stored as close to their current site as possible or as close to their final destination as possible.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>For Capenhurst, the approach roads are less than ideal.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>-</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>If only 1 visit per year, this is not going to affect the community greatly.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>See 2 above.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>No.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>Impressed from what we have seen at Capenhurst.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>Capenhurst</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>If these containers are ultimately to be buried deep underground it seems strange that they are being stored on the surface for the next 40 years or so!</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>No.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>No.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>The amount of <u>existing</u> radioactive material stored on each site. Surely there should be a limit for each site.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Public relations/ transport routes should be adequate.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>I think population densities around each site is an important factor.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>-</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>It seems to be comprehensive as long as the public are being given all the details.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>-</p>
<p><b>Site most interested in</b></p> <p>Aldermaston.</p>

**1. Do you have any comments or views on the proposed RPV storage arrangements?**

How is ok to hold these containers in highly populated areas for 40 years if in long term they need to [be] buried deep underground?

**2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?**

I have concerns about unpredictable weather and the problems of climate change in the next 40 years.

**3. Do you have any comments or views on transport, regulation or planning issues?**

-

**4. What do you think are the main issues that we need to consider with each site?**

I imagine you will choose to use Aldermaston. This will probably be the least vocal/ least obstructive population as so many people work at AWE and are passive about the risks.

**5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?**

My concern is that Aldermaston is in a highly populated area and in a declining county with poor economic prospects, it is likely in the long term, to be poorly managed.

**6. What are your views on our approach to deciding between the shortlisted storage sites?**

-

**7. Do you have any comments on the stages that will follow this consultation?**

-

**8. Do you have any comments about the conduct of this consultation or the information provided?**

-

**9. Are there any other comments you would like to make?**

I feel that the UK is in economic decline and the future is one of increased inequality. People in poverty lose their power to control their lives and I fear for the loss of democracy and consequent lack of care on all the nuclear sites in the UK. We should be dismantling it all and making it safe for the future.

**Site most interested in**

Aldermaston

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>I find them satisfactory.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>I didn't find too much detail on that.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Satisfactory to me.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>With regard to Chapelcross, some political bias against anything nuclear. Overcoming irrational fears when the word is used. In spite of local knowledge of the safety some still have fears.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>-</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>There is good opportunity for all to express their views.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Would like to know how far advanced the plans for Geo storage are.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>The team were open and listening and did not try to sell any particular site.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>I would be happy with Chapelcross as a site and in fact see it as a very good choice.</p>
<p><b>Site most interested in</b></p> <p>Chapelcross.</p>

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Accept that a site needs to be identified for the interim storage of RPVs.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Would prefer minimum movement of RPVs – ie, that sites nearest to majority of subs be preferred option.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Transport should be kept to a minimum. If Chapelcross, Dumfries and Galloway Council monitoring/ regulation/ planning is not the best.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>Geological considerations. Security. Easy access.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Disruption on local roads during building of facility. Noise and security issues once the site is set up and running.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Was impressed with the presentation/consultation and site information provided (at Annan).</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>I am reassured that processes are in place and that conclusions will be robust, including scrutiny by independent specialists.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>A professional approach which has been handled on an even-handed and clear way.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Obviously living close to the facility at Chapelcross, do not consider it to be the best option (Scottish government opposition to nuclear establishments and the local authority's inability to be professional, due to continued in-fighting, are not to be conclusive to good decisions being made locally).</p>
<p><b>Site most interested in</b></p> <p>Chapelcross.</p>

**1. Comments on the proposed RPV storage arrangements?**

I am a Cumbrian opposed to a radioactive environment, so I would not like to see the waste stored at Sellafield.

And my relatives who live in the other areas of Britain would I expect share my views were the waste to be stored on their doorsteps.

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Yes.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Would be interested to learn of issues raised and final decisions made, upon to completion of your final analysis been taken.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>Transport and costs to AWE sites comparative with the other sites would be high to avoid weak bridges and many other rural infrastructure facilities in the local area.</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>RPV warehouse stores above ground invite terrorist bomb attacks from the air, better security for interim storage underground.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Transport access to the site and security together with close proximity of housing.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>By marketing SDP will develop unrest and the future of living in this nice rural area.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Trust the public will be fully informed with all necessary security precautions planned and to be incorporated.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>To be updated and informed.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>Concerned that the selected SDP site would devalue property prices and would question allowances on council tax for living in a deprived area.</p>
<p><b>Site most interested in</b></p> <p>AWE Burghfield and Aldermaston.</p>

**1. Ref: Public consultation, Submarine Dismantling Project**

I received the consultation letter concerning the above project, but did not attend any of the meetings held in my local area as I was unable to envisage what additional information you could provide to that given in the consultation letter. However, I do have a comment on the proposed potential sites for storing the RPVs. I would suggest that the RPVs be stored in the sites nearest to the place where the submarines will be dismantled, ie Burghfield or Aldermaston for submarines dismantled at Devonport, and Chapelcross for submarines dismantled at Rosyth. This would reduce the distance that the RPVs have to be transported, and thus any potential dangers arising from their being transported.

**1. Do you have any comments or views on the proposed RPV storage arrangements?**

NO DUMP

No benefits to local area!

No new jobs created!

Why should we put up with it

They want Chapelcross to be a dumping ground for the radioactive waste from 27 nuclear submarines.

We don't want to become a pariah like Sellafield

WE SAY NO!

<p><b>1. Do you have any comments or views on the proposed RPV storage arrangements?</b></p> <p>Attended meeting with totally open mind, listened to comments and answers to my questions. Answers were fair from SDP team.</p>
<p><b>2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?</b></p> <p>Appear to have covered most items that will benefit MOD in obtaining permission.</p>
<p><b>3. Do you have any comments or views on transport, regulation or planning issues?</b></p> <p>I at one time served my apprenticeship with Cochran and Co, Annan. We moved large pressure vessels by road and sea. We had to meet all regulations - no doubt this exercise will do the same. (See enclosure).</p>
<p><b>4. What do you think are the main issues that we need to consider with each site?</b></p> <p>All issues will and have been covered.</p>
<p><b>5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?</b></p> <p>Adverse comments about <u>dump</u> site for nuclear waste.</p>
<p><b>6. What are your views on our approach to deciding between the shortlisted storage sites?</b></p> <p>Hope you note people's views and not let your decision be political.</p>
<p><b>7. Do you have any comments on the stages that will follow this consultation?</b></p> <p>Keep the general public up to date and not hide anything. Making sure everything is fair and impartial.</p>
<p><b>8. Do you have any comments about the conduct of this consultation or the information provided?</b></p> <p>I got the impression that the people I spoke to assumed Chapelcross was storing spent fuel rods.</p>
<p><b>9. Are there any other comments you would like to make?</b></p> <p>After much consideration I could <u>not</u> support storage at Chapelcross. This area has over many years given much to MOD eg. Nobel's Explosives at Powfoot and Dumfries. Munition works across our area - Chapelcross - plutonium but very little industry left. Please give us some benefit.</p>
<p><b>Site most interested in</b></p> <p>Chapelcross</p>

## **Annex H: Emails and Letters**

---

### **Notes**

For publication in this report, names and contact details have been removed by MOD from the emails or letters in this Annex.

A few of them were also transcribed onto feedback forms. There may be some duplication between appendices but comments have only been entered once in the database.

17 NOV 2014



To :  
The Submarine Dismantling Project  
c/o Instinctive Partners.

Dear Sir,

Thank you for your consultation leaflet.

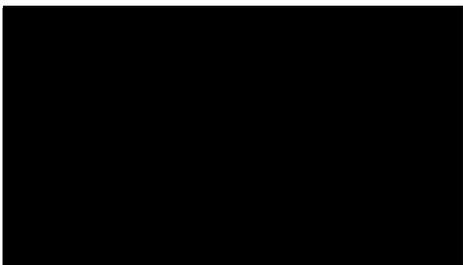
I would say that the AWE Aldermaston site would be the best location option for the interim storage for the RPV's intermediate level radioactive waste (presume they are > 4 GBq per tonne).  
The Aldermaston site is fairly well situated in terms of road access.

Also geologically placed high, generally away from flood plains and or sea water which seem to dominate the other sites.

The required security and I believe area space is available.

One must assume that also it would bring extra employment to the area as an added benefit !

Yours Sincerely,



## Key Questions

You can use this page to record your comments, or write to us by post or email. It helps with our analysis if you refer to these question numbers in your response but it is not essential. Providing your contact details overleaf is optional. Please read the data protection statement before submitting your comments.

1. Do you have any comments or views on the proposed RPV storage arrangements?

*See attached statement*

2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?

3. Do you have any comments or views on transport, regulation or planning issues?

4. What do you think are the main issues that we need to consider with each site?

*Risk to the public*

5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?

6. What are your views on our approach to deciding between the shortlisted storage sites?

*See attached statement*

7. Do you have any comments on the stages that will follow this consultation?

8. Do you have any comments about the conduct of this consultation or the information provided?

9. Are there any other comments you would like to make?

*Yes see attached*

## Your Details (optional)

Your name.	
Organisation (if any).	Nuclear Awareness Group (Reading based)
Which site are you most interested in, if any?	AWR Aldermaston
If you include an address or email here, we will add you to our register and let you know when announcements are made.	
Are you happy for your comments to be published on our website?	Yes / No

## Online Documents

Further information and all the SDP consultation documents are available at:

<https://www.gov.uk/government/publications/submarine-dismantling-project-interim-storage-of-intermediate-level-radioactive-waste>

## Contact Information

Submarine Dismantling Project  
FREEPOST RSKJ-KRAH-YZRJ  
c/o Instinctif Partners Ltd,  
4th Floor, Dukesbridge Chambers,  
1 Duke Street,  
Reading RG1 4SA.

Phone 0118 983 9474  
Email [SDP@instinctif.com](mailto:SDP@instinctif.com)

### Before submitting your comments, please read this data protection statement

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it will be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on MOD.

The MOD will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

The presentation is good, and the public do understand that this waste exists, must be dealt with, and has to go somewhere. Also that if kept safely, and ~~for~~ relatively temporarily, it is relatively harmless. However, it is not risk-free, hence the need to consult the public

I was therefore surprised to learn from the MOD staff I spoke to, that the SDP process is unconnected with other MOD issues. As far as we in the Aldermaston area are concerned, what happens about renewing Trident is connected. We are being asked to comment on the SDP proposals as if whether we get the consequences of renewed warhead manufacture here - waste and radioactive discharges - is irrelevant.

But to us it is relevant, especially, as procurement for Trident replacement has already started.

We won't be consulted about Trident replacement effects on the local community so it is the SDP waste which should be factoring in the additional <sup>public</sup> risk burden for the Aldermaston site. This has not happened.

16 DEC 2014



FREEPOST RSK-KRAH-YZRJ  
Submarine Dismantling Project  
C/o Instinctif Partners  
4<sup>th</sup> Floor  
Dukesbridge Chambers  
Duke Street  
READING  
RG1 4SA

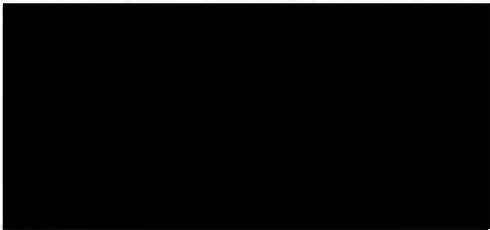
Dear Sir,

Having worked at Sellafield for over 40years in the handling and storage of all radioactive waste forms I have no objection in principle to the proposed storage of RPVs from our "boats". I recall when the first storage pond



However, like a lot of people in this area, I feel that "enough is enough" and the choice of Sellafield for this purpose would only enhance the "nuclear dustbin" image. In my opinion, Chapelcross has much to commend it, having had many years experience in the handling and storage of high level waste. It will also need space to store its own neutron activated pressure vessels and core components as decommissioning proceeds. Neither Capenhurst, Burghfield nor Aldermaston have these attributes.

You need not reply to my letter, I am sure you will get a large response, but an acknowledgement by e-mail would be more than adequate.



Rain, Don Paterson  
© Don Paterson, 2011  
Reproduced by permission of the author  
c/o Rogers, Coleridge & White Ltd

3 59 A.M. - 23.1.15

26 JAN 2015

National Poetry Day in Scotland  
Thursday 3 October 2013 - WATER

It would be  
profoundly upset-  
-ting if Chapel-  
-cross was to be  
chosen as a site  
for storage of  
intermediate level

Did you know?  
Water may look safe, but it can be dangerous. Learn to take care and be aware of the dangers near water.

COMPENSATIVE CO. UK

radio-active  
waste. from 20  
| 20 20 20 20 |



www.facebook.com/scottishpoetrylibrary  
@ByLeavesWeLive

For all 8 cards in this set send a 1<sup>st</sup> class SAE to:  
NPD 2013, Scottish Poetry Library  
5 Crichton's Close, Canongate, Edinburgh EH8 8DT

NPD poem posters, teaching resources & films:  
[www.scottishpoetrylibrary.org.uk](http://www.scottishpoetrylibrary.org.uk)

Explore Scottish Water's education materials:  
[www.scottishwater.co.uk](http://www.scottishwater.co.uk)

Supported by:



SCOTTISH POETRY LIBRARY

By leaves we live

In partnership:



Scottish Water  
Always serving Scotland

Subject: Submarine Dismantling Project : AWE Aldermaston

So Richard Benyon MP is absolutely relaxed about MOD plans to store radioactive waste from redundant RN nuclear submarines in Berkshire (BBC South Today 17 Oct 2014). Hopefully he will excuse those of us with serious misgivings about trusting the sites concerned, i.e. AWE Aldermaston & AWE Burghfield. The following information may be of interest :

From NWN Reporter(extract) 14 Oct 2014:

AWE Aldermaston has been rapped on the knuckles by a Government watchdog over safety concerns - for the second time this year. According to the Reading based Nuclear Information Service, the Environment Agency has raised a 'noncompliance intervention' against the Atomic Weapons Establishment, which also has a site in Burghfield, and manufactures and maintains the country's nuclear deterrent, Trident. This followed a site inspection in July, which revealed that insufficient numbers of competent staff were in place in order for AWE to comply with environmental permits. Earlier this year, the Office for Nuclear Regulation(ONR) announced it was considering enforcement action against AWE for failing to comply with instructions for managing a growing backlog of radioactive waste.

From NWN Reporter(extract) 07 Nov 2013:

The Office for Nuclear Regulation (ONR), report published on Tuesday (Nov 5) lists several UK nuclear sites requiring "an enhanced level of regulatory attention" including AWE Aldermaston and Burghfield, where the UK's nuclear weapons are manufactured and maintained. Peter Burt, director of the Reading-based Nuclear Information Service, said the ONR had identified the AWE sites as priority 2 sites, expected to require enhanced regulatory attention for the next two years. "The regulator has placed AWE on its priority list because of its "high hazard operations and aging facilities" and because there have been "issues on timeliness / quality" during recent safety reviews involving the company," said Mr Burt.

Also, the Health & Safety Executive (HSE) reported on 28/5/13: "The Atomic Weapons Establishment PLC (AWE PLC) has been ordered to pay more than £280,000 in fines and costs for significant failings relating to its use and control of explosive materials after a worker was injured when a fire broke out in an explosives processing building."

A charitable person might suggest that Mr Benyon is merely displaying naivety with his comments, however, a more accurate description might be worrying and dangerous

irresponsibility. It is clear that AWE, whether due to a disproportionate focus on profit or other reason(s) cannot continually play 'catch-up' with safety regulations and procedures, particularly given the extremely dangerous nature of the processes and materials involved.

With the obvious added risks of a private company operating the AWE sites (with their profit motive), it is vastly more necessary for the various 'watchdogs' to do their jobs properly and thoroughly. In that respect, going by the above, they have, it seems, failed miserably in their respective duties. How many warnings do we need?

Due to their appalling record, neither site, Aldermaston or Burghfield, should be considered for the Submarine Dismantling Project.

05 DEC 2014

05 DEC 2014



30 December 14

**Submarine Dismantling Project**

Dear Sir,

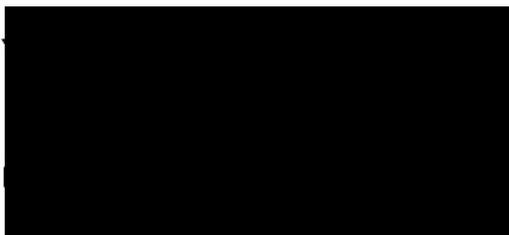
**SITE CONSULTATION  
SUBMARINE DISMANTLING PROJECT**

I attended the public consultation for the Capenhurst site, where I was previously the independent chairman of the Local Stakeholder Group for the NDA.

I have only two comments to make –one on transport the other on the environment.

1. Both Rosyth and Devonport have port handling facilities as does Ellesmere Port –a few miles from Capenhurst and which handled 'tails' cylinders for Russia. Would it not be cheaper and safer to use a Royal Naval vessel to transport the one or two RPVs per annum to Capenhurst ?
2. There are already redundant concrete bases at Capenhurst left over from the decommissioning exercise. We particularly asked for them not to be broken up as they could be needed for some future use. I trust they are still available as this could reduce the environmental impact.

I hope these comments are useful.



Subject: SDP Consultation

As a local resident living in Mortimer and therefore close to 2 of the potential storage sites at Aldermaston and Burghfield I wish to give the following comments.

1. As a lay person I am simply not qualified to comment on whether any of the 5 sites are suitable or safe, so inviting comments on the aspect that will be of most concern to local people is pointless.
2. Given the nature of the proposal we have to put our faith in the 'experts'. Regulations are only as useful as the monitoring regime and the knowledge and resources available to undertake it and, given the longevity of the storage period, I have little confidence as the decisions and resourcing will be determined by politicians.
3. No sane person is going to say in response to the consultation 'can I have it stored near me please', so my conclusion is please store this stuff as far away from me as possible.

Regards

Subject: SDP

I have the following comments number follows the questions on P47 of the consultation document.

1. Approach looks sound, as do the proposed transportation methods. Given the low level radioactive profile, I can see no problems with the proposed COA.
2. No
3. No comments, it seems to be well planned and the reactor can hardly be seen as a terrorist target, or excessively risky
4. Long term security and monitoring and risk from fire, or asymmetric attack.
5. Few if any. Once the thing is built no one will even think about it.
6. Build it where it makes economic sense (i.e. lowest cost to the tax payer), subject to risk assessments etc.
7. None
8. Useful to have the consultation, not sure if local community (and even less local politicians) are actually in a position to make any real criticism, other than hysterical reaction to anything radioactive.
9. The sooner the submarines are dismantled the better. Where they are at the moment must be consider inherently more risky than bring the reactor vessel ashore.

Subject: CNS site Capenhurst

To whom this may concern,

I have just realised that today is the final day for you to receive comments on the proposed long term storage of submarine reactor vessel material.

As a local resident of Ellesmere Port I object to the storage on the following grounds;

1. We already have the danger associated with transport of hex via ellesmere port docks on a fairly regular basis and using the A41 and Capenhurst lane they pass close to large areas of residential housing.
  2. Local future plans include large areas of residential housing and school off ledsham road to the west of and very close to the site.
  3. You state that there may be some minimal radioactivity but over a proposed 25 year storage what does this mean for the close residents in terms of possible exposure time and received dose. Whilst I understand the inverse square law more local residents will be housed at short distances in the above local plan.
  4. Waste storage should wherever possible be stored in remote locations away from large residential areas and for this reason I cannot understand why this site is on the short list.
  5. The Ellesmere Port area is one of already very high risk for petrochemical and chemical sites including many COMAH sites as well as your own.
- Concerned resident.

10/12/14

I am a Cumbrian opposed to a radioactive environment, so I would not like to see the waste stored at Sellafield.

And my relatives who live in other areas of Britain would I expect share my views were the waste to be stored on their doorsteps.

I live on Merseyside, so I am interested in the CAPENHURST SITE.  
I do 'not' mind my comments being published.

16th November 2014

1. Do you have any comments or views on the proposed RPV storage arrangements?

Yes I do.

The documents give the impression, that, once the underground storage site is opened, the submarine parts can go straight into it, without, needing a period in the Interim Storage Site. I thought the Interim Storage was to be used, until the submarine parts, had radioactively decayed enough, to go into the underground storage. Cobalt 60 with a 5.5 year half-life is more radioactive than Uranium or Plutonium, which have half-lives over thousands of years long; and yet this consultation is classifying the waste as "Intermediate Level Waste".

The public are being led to believe there will only be 27 submarine parts stored at the site. The Government's response to the ISOLUS document, makes it clear it has no intention of stop building nuclear submarines; therefore more than 27 submarines will need storing. A recent letter, I received, from the MOD confirmed this.

2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?

No.

I expect the Local Authorities will bring up any environmental matters. I was surprised to read, that Sellafield is allowed to dump 2,000 kilograms, a year, of Uranium, into the Irish Sea.

As I understand it, Moorside near Sellafield, is to have three AP1000 nuclear power stations built by Westinghouse, not one.

3. Do you have any comments or views on transport, regulation or planning issues?

Yes.

I thought it would have been quicker and safer, to transport the material by sea, instead of by road. As I understand it, the material will leave Rosyth, by the M90, and arrive at Capenhurst by the M56. This long journey will probably take several days and need overnight stops. The cost of wages, security, and the traffic disruption to the towns the material goes through; must make sea transport cheaper. The examples in the document show PRVs being moved by rail and sea. Road transportation is only used to get the

object from the reactor, to the rail or sea depot.

Cheshire West and Chester council knew Capenhurst handled nuclear material, before it gave permission to build 1,500 new houses at Sutton New Hall farm. Whether the new owners of the houses, object to Capenhurst increasing its operations-- is for the future.

4. What do you think are the main issues that we need to consider with each site?

Capenhurst is in a strange position. It has volunteered to take the submarine material, but the factory is up for sale. Who is going to buy a factory, that has 27 nuclear submarine parts, stored in its backyard? This is going to effect the future and finance of the Capenhurst factory. The Capenhurst site is supposed to be a " Atoms for Peace" factory, so these military nuclear submarine parts are going to change that.

5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?

With any nuclear factory, the main things are :-- release of nuclear material into the environment; accidents involving transport of nuclear material past peoples homes; devaluation of their homes after an accident.

6. What are your views on our approach to deciding between the shortlisted storage sites?

I think there should have been more publicity, especially for Capenhurst. Other sites have been involved for years, Merseyside people only learnt there was a submarine project, in April 2014.

7. Do you have any comments on the stages that will follow this consultation?

No.

I am hoping Capenhurst will not get picked, therefore there will be no further stages.

8. Do you have any comments about the conduct of this consultation or the information provided?

Yes.

I was baffled to learn that members of the Advisory Group had to sign 'Non Disclosure' agreements. People were told it was to be a frank and open consultation, making decisions 'now' instead of leaving the problem for future generations to solve.

Gagging the Advisory Group, is not being open and frank. The unredacted documents they saw --- as I understand it --- contained price quotations, and peoples names. If the British taxpayers are to get value for money, we need competition from other companies who have also seen the unredacted documents. Operational Analysis Supporting Paper (OASP) Issue 1.0 - October 2012, is one example of a redacted document.

9. Are there any other comments you would like to make?

Yes

I am a member of Merseyside Campaign for Nuclear Disarmament, (MCND), but the views I have expressed are my own, not necessarily the groups.

I think building an ILW storage for 27 subs, is wrong. The current Government and the last Labour Government, have made it clear they intend to carry on building more nuclear submarines. This could mean an ILW storage for 60 submarines could be too small. I think where the PRV is cut up is important. It is pointless to bring the PRV to Capenhurst, from Devonport, for storage; then transport it to Aldermaston for cutting up. Capenhurst used to enrich Uranium for Britain's Atomic Bombs, using a "Gas Diffusion" plant. The plant was cut up and placed in acid baths. The decontaminated metal was sold. This submarine project should have used a similar plan.

Subject: Capenhurst Nuclear Services

Dear Sir/Madam,

I would like to register my opposition to the proposed storage of contaminated steel components from MOD nuclear submarines at Capenhurst Nuclear Services.

I oppose this as the areas around Capenhurst are predominantly residential and it would make sense to me to minimize the number of local inhabitants as far as possible around any nuclear facility/operation.

Further, there is planned a new housing development of 1500-2000 new homes in the Ledsham and

Manor Ward which is a stones throw from CNS. This fact alone must seriously undermine the choice of Capenhurst as a viable place for expansion of operations.

I look forward to your response.

yours faithfully

**I would like to reserve a place on a workshop to discuss the MOD's plans for the assessment and selection of the storage site for the RPVs.**

**Cleator Moor Civic Hall and Masonic Centre on:**

Wednesday 17 December 2014   
Wednesday 28 January 2015

**The Beacon Museum on:**

Thursday 18th December 2014   
Tuesday 27 January 2015

Please state your preferred time (workshops are due to run for 90 minutes) and will start at:

1pm   
3pm   
6pm

*Really, these 'consultations' are cosmetic since HMG will already have made the decision. If the consultation result does not agree, they will re-formulate the consultation to get the answer they require - as they did for the 'repository' consultation in W Cumbria.*

NAME:	[REDACTED]
EMAIL or ADDRESS for confirmation:	[REDACTED]

I would like to receive email alerts when there are updates on the project.

**FREEPOST RSKJ-KRAH-YZRJ  
Submarine Dismantling Project  
c/o Instinctif Partners  
4th Floor  
Dukesbridge Chambers  
Duke Street  
Reading  
RG1 4SA**

NB. You do not have to register to attend an exhibition unless you wish to take part in a workshop.

Subject: Submarine Dismantling Project.

Dear Sir or Madam.

The area around Sellafield Nuclear site has always been dependant on this industry thousands of people have had employment and rewarding careers and most of the workforce would want the area to be considered for the underground storage of nuclear waste. and communities recognise the benefits associated with hosting such a facility with investment of the infrastructure. But the county council deciding 7-3 that west cumbria should no longer be considered as a potential location for a deep geological repository to dispose high radioactive waste has left the community split. Groups like friends of the earth green piece and many other environmentalists who put pressure on the members of the counsel and independent geologist also stated that the area was unsuitable and were not in favour BUT more research could have been done. On the 22 May 2014 a referendum was carried out in the Borough to change the style of governance in Copeland to a directly elected Mayor after campaigners from the time for change team successfully won an electorate vote with people from many areas including Whitehaven, Egremont, Millom, Bootle and others. The message of zero confidence in the present copeland borough council was a decisive vote of no confidence. 51 councillors had a voice and a vote but now with an elected Mayor this would in the main disappear a MAYOR has the power to push through major decisions with or without approval from the council so who knows what the future holds for underground storage. So in the meantime while this debate and the future of West Cumbria continues focus should now be on improvements to current surface storage of waste at Sellafield site to accommodate the Submarine Dismantling Project. Sellafield has been a part of our community for decades and nobody wants to harm that industry so the Storage of Submarine parts would not cause great anxiety to pressure groups and the interim storage could lead to bigger things in the future 2040 seems a long way off.

Subject: Chapelcross

I have found it difficult to get in contact with the authority in charge of deciding which site is to be used for radioactive waste products. I hereby object to the use of Chapelcross in Dumfriesshire to be used for this.

I live very near to this place and do not want to the remotest chance of my beloved country to be contaminated in this way.

Subject: Submarine Dismantling Project (RPV)

Sir

I read with great interest your Public Consultation Document having worked in the Nuclear Industry at Sellafield for over 35 years.

The RPV's will be neutron activated the main one probably being Cobalt 60 which has a five year half life.

As for the storage sites there are only two worth considering, Rosyth and or Devonport.

Otherwise you would be transporting the RPV over large distances on poor roads.

Some have a rail links but Chapelcross and Capenhurst do not and this might apply also to the AWE sites.

A special facility will also have to be built to house the RVP's and to transport them across to the accepted sites.

Sellafield does have an intermediate facility but I think it would require some modification to accept the RVP's and be very expensive for storage.

I haven't looked at all the decay products and their half lives but I would suggest the RPV's be stored on site until they become LLW and can be stored at the LLWR at Drigg. <12 Giga Bq/t.

Devonport is by far the best site so far, as dealing with the EA is easier than SEPA.

Regards

Subject: Response to public consultation.

Here are my responses to the questions raised in the consultation that ends later this evening:

- 1 No
- 2 I have no comments on the SEA
- 3 Transport would probably be a problem to and from both AWE Aldermaston and to / from AWE Burghfield. I don't know the areas around Capenhurst or Chapelcross but I think Sellafield is well suitable
- 4 Probably the main issues with the sites are the unsuitability of AWE Burghfield due to likely flooding, plus for AWE Aldermaston ... the history of accidents. Both are near major centres of population.
- 5 Issues for the community. I will reserve judgement on these.
- 6 Approach to deciding between shortlisted sites: However unlikely it might be but consideration should be given to contaminants finding their way into the River Thames and thus into London's water.
- 7 No
- 8 No
- 9 No, not at the moment.

Regards

Subject: Submarine Dismantling Project - Views

Dear Sir/Madam

As a resident local to your Burghfield and Aldermaston sites, I feel strongly that these are not the appropriate locations for this project. I would like to object accordingly.

This objection is based on public safety grounds, as these sites are inland and close to a high number of the population.

I also object on safety transportation grounds.

The other three shortlisted sites are based near the coast and in my opinion would be far safer.

Yours faithfully

Submarine Dismantling Project  
FREEPOST RSKJ-KRAH-YZRJ  
c/o Instinctif Partners Ltd,  
4th Floor, Dukesbridge Chambers,  
[1 Duke Street, Reading](#)  
[RG1 4SA](#). Phone [0118 983 9474](#)  
Email [sdp@instinctif.com](mailto:sdp@instinctif.com)

## Key Questions

1. Do you have any comments or views on the proposed RPV storage arrangements?

I oppose the placing of the nuclear sub RPVs and any other nuclear waste at [Chapelcross](#), Scotland. It undermines plans by Annan to diversify its economy and jeopardizes agriculture, dairy farming, animal husbandry, and other aspects of the food industry, as well as tourism and forestry in the region. This is both from a risk perspective and an image perspective. People have invested in the region with the understanding that Chapelcross was shutting down. If you continue to poison rural areas where do you think you will get your food? A minor accident at [Chapelcross](#) can directly impact around 250,000 or more people. It is clear from the declassified document "SUBMARINE DISMANTLING PROJECT, 2012 COEIA MCDA Data Report" that MOD considers the waste highly dangerous and difficult to contain passively. It is not clear in the consultation. The above report repeatedly states that it should be in a remote location. Especially since it is dangerous, it needs to be in a non-remote location so that it can be monitored. Neutron activated radioactive metal, found in the RPVs, such as nickel 59, has a half life of 75,000 years, niobium 94 has a half-life of 20,300 years and Cesium 137 has half-life 30 years. I have found no mention of this. I guess this is why MOD hired a savvy PR firm. When a 5 year half-life is alleged for the reactor pressure vessels, they are speaking of Cobalt 60.

It is military waste and belongs to a military site, such as Aldermaston or in MOD bunkers in London. Why is it ok to have an oil refinery near London but almost everything nuclear is placed on the Irish Sea? If the waste is more dangerous than an oil refinery, that speaks volumes. After wondering why MOD was so worried regarding the inability of containing the waste passively or dropping it and their angst about the dangers, I realized that it's because these RPVs have suffered salt and other corrosion damage and that with radiolysis they may build up flammable, explosive gases. One more reason for it to be properly monitored in or near London, either in the Home Counties, or Cambridgeshire area. Because of earthquake risk, the best area is near Cambridge, followed by Aldermaston. I furthermore oppose the leaking of radionuclides into Scottish air and water at [Rosyth](#) and [Faslane](#).

[Chapelcross](#) is the indigenous home to the Johnston Clan, most of whom were forced off the land through government policy, both economic and political. As such, you need to consult with those with Johnston ancestors the world over. It is not your land. It is ours.

The only good thing which I can say is that the UK-MOD is responsible enough not to bury the old reactor vessels like the US is doing. Now the UK-MOD needs to take this mature attitude one step further and keep the waste close in to London, where it will be better monitored, and stop dumping on rural areas.

2. Have you any comments on the Strategic Environmental Assessment or the other information we have presented on environmental issues?

The area which needs to be considered is at least a 50 mile radius. Even within an 18 mile radius there are at least 250,000 people, who can be impacted by an accident with Chapelcross nuclear waste, old or new.

It is clear from the declassified document "SUBMARINE DISMANTLING PROJECT, 2012 COEIA MCDA Data Report" that MOD considers the waste dangerous in a way which is not clear in the consultation documents. They apparently fear radiolysis of the metal, production of hydrogen gas and explosion. They repeat that it should be in a remote location. If it is dangerous it needs to be in a non-remote location so that it can and will be monitored. It is military waste and belongs to a military site, such as Aldermaston or in MOD bunkers in London. Why is it ok to have an oil refinery near London but almost everything nuclear is placed on the Irish Sea? If the waste is more dangerous than an oil refinery, that speaks volumes. After wondering why MOD was so worried regarding the inability of containing the waste passively or dropping it and their clear angst about the dangers, I realized that it's because these RPVs have suffered salt and other corrosion damage and that with radiolysis the packages-containment may build up flammable, explosive gases. One more reason for it to be properly monitored in or near London, either in the Home Counties, or Cambridgeshire area.

Neutron activated radioactive metal, found in the RPVs, such as nickel 59, has a half life of 75,000 years, niobium 94 has a half-life of 20,300 years and Cesium 137 has half-life 30 years. I have found no mention of this. When a 5 year half-life is alleged for the reactor pressure vessels, they are speaking of Cobalt 60.

I do not recall these many dangers having been made clear in your SEA.

If you continue to poison rural areas where do you think you will get your food? It endangers agriculture, dairy farming, animal husbandry, and other aspects of the food industry, as well as forestry and the environment.

It is fairly clear in your documents that the RPVs will be cut up and dangerous radionuclides emitted into the Chapelcross area before they are removed. This is dangerous and unfair to those who live there, are visiting as tourists, and those who obtain their food from there. Furthermore, all waste should be completely filtered and not leached into the environment.

I stand amazed that URENCO is allowed to operate so near to the large cities of Liverpool and Manchester and that MOD wishes to add to this at Capenhurst. Also, the dangerous state of Sellafield is ridiculous and adding more dangerous waste to it could jeopardize the entire UK and even much of Europe.

I oppose the concept of ALARP and ALARA as currently practiced. It has its roots in a coal-mining disaster which is a totally unrelated topic, except that it shows the low value put on human life by the UK. Additionally, the technology exists to contain the nuclear waste even if it costs money and results in more nuclear waste. Radionuclides must be properly contained. Leakage must stop.

3. Do you have any comments or views on transport, regulation or planning issues?

It undermines plans by Annan to diversify its economy and jeopardizes agriculture, dairy farming, animal husbandry, and other aspects of the food industry, as well as tourism and forestry in the region. This is both from a risk perspective and an image perspective. People have invested in the region with the understanding that Chapelcross was shutting down. Coming with this extra nuclear waste is unfair. It was unfair to place Chapelcross nuclear reactors in this location to make MOD's tritium in the first place.

The impact area needs to be extended to at least a 50 mile radius.

Sellafield and Chapelcross are at risk of, and both have suffered from, damaging earthquakes.

4. What do you think are the main issues that we need to consider with each site?

The RPV waste needs to be readily accessible to London and not "remote", so that it can and will be properly monitored. For Chapelcross, the fact that people are investing in a nuclear-free future which this jeopardizes, as well as impacts to food and the environment need to be considered. You can't say that Chapelcross is shutting down, allow people to invest in other non-compatible things, like food and tourism, only to come back with more nuclear waste. The fact that the Chapelcross area is empty only because the people were cleared needs to be considered. The choice of Chapelcross is both unfair and dangerous. Nuclear anything in Capenhurst is appalling due to its proximity to Liverpool, and even Manchester. Sellafield cannot even handle its existing waste burden and is a UK-wide disaster waiting to happen. Sellafield and Chapelcross are at risk of damaging earthquakes.

5. Once a site is chosen, what do you think will be the most important issues for the potentially affected community?

A very thick-walled above ground bunker for the waste and proper monitoring of gas build-up in the containers. The walls should be thick like in the Middle Ages and the air exhaust filtered.

An evacuation plan for at least 18 miles and proper hospital facilities. If it is Chapelcross or Sellafield, clarification of where milk and other food will come from once Westminster-MOD finish poisoning these rural areas, along with the Irish Sea.

6. What are your views on our approach to deciding between the shortlisted storage sites?

This question is unclear. Do you mean choosing which sites were short-listed? The choices of which sites were short-listed appears biased and unfair. They underline the fact that no-one and nothing in the UK outside of London matter to the ruling classes, except what they can extract in the form of taxation or by other means. There has been no clarification of how Devonport got off of the short-list. Is it because of its proximity to the Channel Island tax-havens? Or, is it really because it is in city centre, and the UK evacuation zones are so ridiculously small by any standard, making it falsely appear that other sites impact few, when they impact many. Is Devonport a wealthier city? Is an important parliamentarian there? Why are the lives of its people more valued than those around the Irish Sea?

If you are asking for ideas regarding how to choose, then the choice for storage should clearly be a MOD site. And, it should be close to the population which most benefitted from the nuclear submarines, i.e. London and the surrounding areas.

7. Do you have any comments on the stages that will follow this consultation?

I have no idea of what stages follow the consultation. While I presume that my comments will be ignored, I still thank you for the opportunity of commenting.

8. Do you have any comments about the conduct of this consultation or the information provided?

I congratulate you for having this consultation and for making available the very pretty documents-information. Nonetheless, it appears to waltz by the real issues of apparent dangers involved in the siting of the waste. Beauty and form appears to have come before content. The mostly very impoverished UK taxpayer probably does not want to know how much they have paid "Instinctif Partners" for these lovely documents, nor that "Instinctif" also represents the Russian government-owned diamond company Alosa.

9. Are there any other comments you would like to make?

Thank you for having this consultation. However, the true dangers of this waste and how the dangers will be addressed, other than putting it in a so-called "remote" location as a solution to an accident is unacceptable. Additionally, the 50 million plus Scots who have been exiled by the UK and are not allowed right of return should be consulted about the usage of their land.



Which site are you most interested in, if any?

Chapelcross and Sellafield

Subject: Submarine Dismantling Project

This whole project makes me very uneasy. Why we continue to produce radioactive material concerns me. I understand from a recent Radio 4 programme that the scientific world is concerning itself over securing this material over it's half life considering the loss of information and what problems it may cause in the future. They were asking the church if it was possible to include something in the doctrine to keep people away from sites for a time when the information on the locations has been lost. You have to consider this is thousands of years.

This is very concerning but will not be in my lifetime. I'm concerned about my life, the life of my family and pets and the potential for radiation leaks which I understand have happened in the past and caused local problems and very likely, illness and death. Can you be sure that you can secure this waste this time and if so presumably you will releasing information on compensation packages: if you are so certain you can secure it there is no harm in offering huge sums.

I don't expect a reply. I don't expect you to take any notice at all but I would just like my feelings clear.

Regards

To: ZZ\_SDP

██████████ ██████████  
██████████ ██████████

Dear Sir/Madam,

I am writing in response to the deadline to respond to the team administering the Public Consultation on behalf of the MOD in relation to the Nuclear Submarine Dismantling Project.

I have attended the public display and read all the words there. I have also read the brochure they gave me to take away.

I am writing to strongly oppose the use of Chapelcross in this matter due to the grounds of proximity to residential areas, unsuitable and unsafe local road network ( which this county is renowned for). Not to mention constant opening up of the ground in large pot holes on all roads. Last year there were 800 claims against the council for pot hole damage to vehicles in the county and they is just the ones who claimed. My fiancé did not. As soon as they are filled they reopen again. Some very large and deep. Also I oppose it on the grounds of potential damage to wildlife and water courses which can then effect humans.

The nature of the landscape here is that areas are either flooding or they have water running down away from them.

I believe unlike what I read in the documents, there IS actually a security issue to these not been stored at a much more secure MOD site.

Terrorists are constantly re thinking ways to cause terror. Always looking for weak areas to cause maximum effect and damage.

Above ground storage in a warehouse house like structure on a non MOD site I strongly believe is a very dangerous step.

I am very concerned for the safety and welfare of the local people as well as the wider community.

The cooling towers were only taken down on this site in 2007.

The people who have had to live in the shadow of this place. A psychological and physical blot

on the most beautiful landscape were finally moving forward mentally to a future without

Chapelcross which I appreciate is further into the future than the predicted date for the RPVs to

leave the site. But the people knew what was left there and how it was being managed and the

future was starting to look up for the area. Annan, the nearest town has suffered from less

interest in it due to its proximity and housing has been lower priced and harder to sell in this part

of the county. It may go lower still with RPVs so proximate and may create negative equity for some people as well as causing people to struggle to sell as well as not encouraging people to the area which is what the schools need to survive. For the sake of the people and the local wildlife and water, their security, their health and their eventual better living and prosperity please listen to people who live here who know.

It is also the only Scottish one of the 5 possibles and I would strongly consider avoiding the complications of a possible independent Scotland with its anti nuclear sub policies during the lifetime the RPVs are above ground. The cost and complications of moving them from Scotland at the demand of the Scottish government must be taken into account. The face of politics is changing and anything could happen.

I beg that you take my points seriously and even consider extending your consultation time and speak to the local people in a better advertised way. A lot of my friends didn't know about it. When I attended the local consultation there was no disabled access up to the first floor room and 2 MOD had to carry my buggy up with my son inside it then dish again at the end. It should be done again with disabled access and proper clear advertising of it happening in the local area. Anyone would think you didn't want people to know about it!!

I await with dread and hope to the decision that will be made.

Best wishes

Subject: Public consultation response: Chapelcross

Dear Sir/Madam,

I attended the public consultation event in Annan last Friday.

Having considered the displays, and publications available, I would like to note, as a consultation response, that I feel the proposal to use the Chapelcross site for storage would be unsuitable due to:-

a) Road access problems. I have experienced the disruption caused previously by nuclear fuel convoys to the site, whilst the site was operating as a nuclear power station. The small rural roads make access to the site very difficult.

b) I would also note concerns related to the potential for increasing radiation levels for the surrounding environment and population.

Yours Faithfully,

To: ZZ\_SDP  
Subject: SDP project

Brief responses to the key questions on MoD de&s consultation form FS2 issue 1.0

1. To reduce future double handling and easier waste management, Sellafield would seem to offer advantages for the interim storage of the RPVs and their internals.
2. The SEA deals only with routine and normal situations. Where are the fault scenarios, risk assessment and ALARP assessment to be addressed? Will preliminary HAZOP studies be carried out as part of the optioneering process?
3. I am confident that the Regulatory requirements for transport, ONR submission, and planning can be adequately met if Sellafield was to be used.
4. A key requirement to be considered for each site is demonstration that the ALARP principle has been satisfied both for routine hazards and risk arising from fault scenarios.
5. A potentially affected community near the chosen site will need to feel confident that any increase in identified routine or accidental risk will not be significant, that adequate safety measures will be in place to protect the environment and satisfy risk criteria.
6. The approach to deciding on the storage site is thorough. Should it also include the ultimate through-life issues of size reduction and waste disposal. Why not assume that size reduction and ultimate disposal should be on the same site as the RPV storage to reduce double handling?
7. No comment on the stages following consultation which no doubt will follow precedent and hopefully benefit from UK past experience with similar nuclear related projects.
8. The consultation process appears to have been conducted in a professional and satisfactory way with adequate information for the general public. I would have personally liked to see a preliminary fault schedule which will ultimately contribute to supporting the ALARP argument associated with the site selection.



---

Submarine Dismantling Project Team  
Whitehaven Public Presentation  
Tuesday 27 January 2015

I came along to the above presentation a few days ago and hope the following comments will be useful. (I have not worked at Sellafield)

The Thorp and Mox buildings at Sellafield are being run down and will presumably become vacant in a few years. – Would these areas provide buildings suitable for the RPVs instead of constructing new ones? Don't know where the spent fuel storage ponds are in relation to these buildings – the ponds are giving logistic problems at the moment.

Carlisle is the nearest airport to Sellafield (owned by Stobarts – the trucking company). There is local opposition to using the airport commercially but it is used for NATO exercises including paratroopers. As far as I know it is still classed as an emergency landing strip for commercial planes.

A new build nuclear plant is planned next to Sellafield as Moorside. New power lines, both North and South from the site, are in the pipeline. There have been public displays similar to the one concerning the submarines.

The rail line is receiving more funding, it is not electrified so steam trains are still a tourist attraction in the summer. There is probably spare capacity on the line.

Workington port is being expanded – see attached newspaper clipping  
It has two cranes for unloading cargo boats and Ro-Ro capabilities  
Sellafield paid for the installation of a larger crane fairly recently.



## PRISM Reactor at Sellafield

I recently attended a U3A Science Group talk about the PRISM reactor. The speaker was obviously hoping that this would be chosen for the new build at Sellafield. Its selling point was that it could reprocess nuclear fuel waste better than the Mox plant and would not leave so much to be stored for years to come. There would be a fuel reprocessing plant as part of the new build – this could carry out further reprocessing of the waste already at Sellafield. The speaker estimated it would probably be 20 years before a reactor would be up and running at Sellafield.

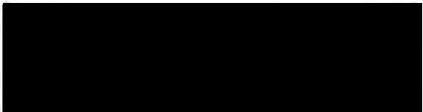
## Transportation of the RPVs by road

Drive the route using an HGV and with a camera in the cab. Have a local driver in the cab as well to give an insight into the local road problems. Presumably a similar operation would be useful at Devonport and Rosyth.

A66 Workington to Penrith (Eastbound) was the old railway line for much of its length, so is flatter and has gentle curves. However the westbound route from the M6 to Workington is much narrower in places and follows the contours of the fells. The trees also overhang the road to a greater extent.

The government has recently announced finance for upgrading the A66 East of the M6 but not westward towards Workington. Cumbria County Council is not happy!!

Hope the above notes are useful.



# Huge investment at Port of Workington

THE Port of Workington has been given a multi-million-pound boost.

A new road bridge is planned to replace the existing structure over the railway line between Northside roundabout and the port.

Traffic controls are in place on the current bridge because of decay.

Infrastructure improvements are planned at the port, including reconstruction of two berths.

Its existing railway lines will be improved to allow them to be used more and make access in and out of the port easier.

Money for the work is included in £20.9 million of Government funding for Cumbria announced yesterday.

It will come from the Local Growth Fund, through Cumbria Local Enterprise Partnership.

The LEP had bid for £10.5 million for the port but the exact funding to come from the countywide pot is still to be confirmed.

Cumbria County Council has pledged £3.5 million towards the work and other funding could come from Network Rail.

By Sarah Moore

sarah.moore@cncmedia.co.uk



The work is expected to improve business at the port and provide better access for land north of the site.

That land, including the former site of the temporary Tesco store put in after the 2009 floods, is owned by Allerdale council and is designated for employment use.

The countywide investment could create up to 3,000 jobs.

It is due to be provided to Cumbria Local Enterprise Partnership from 2016-17 for a three-year programme of work.

Nik Hardy, operational manager at the partnership, said its next step was to draw up full business cases for the projects and ensure they could be delivered within the set funding limits.

He said: "We expect that this spending commitment will be honoured by the next parliament."

Workington MP Sir Tony Cun-

ningham said: "This could be a massive opportunity opening up for the port.

"There will be companies jumping at the chance of investing and developing something close to the port.

"It could also help the nuclear industry because you have to get things in. This investment has huge economic significance."

Workington county councillor Gerald Humes, vice chairman of the county council's Allerdale local committee, added: "We have always been pushing for this and it's really fantastic news.

"You are not going to attract new businesses unless you have better infrastructure."

The overall Government funding will also pay for a second phase of the Connecting Cumbria Project to roll out super-fast broadband across the county.

The project previously brought the service to 111,000 Cumbrian homes and businesses. The extra cash will benefit 5,000 more premises.

Cash will also be spent on projects in Carlisle, Barrow and Ulverston.



06 DEC 2014

Dear Sir/Madam

Thank you for the opportunity to offer my view on the possibility of Submarine waste to come to Sellafield in Cumbria.

I came as a retired person to Cumbria 8 years ago and have little knowledge of what work goes on at Sellafield or what impact the submarine waste would have if delivered to Sellafield, my concerns are with the transport of hazardous waste through Cumbria.

Many of our roads are in poor condition and only a few are dual carriageway and even then there are a lot of bends of varying degree and hills of varying gradient. Traffic at certain times in the day locally is already difficult due to the travel to and from the Sellafield shift patterns

If Sellafield is chosen a very careful selection of the route will be necessary even to doing a "dummy run" before the actual journey proper takes place.

There would obviously be some benefits such as extra employment possibilities. Along with your project there is also the possibility of a further nuclear station being built near by if the necessary planning from all those concerned can be acquired. If this were to happen then something quite radical would have to be done about the local roads in West Cumbria otherwise it would be a "nightmare" for the local people who travel the roads for various reasons also to cope with the tourist /seasonal traffic.

This isn't meant to be a letter to put problems in the way of progress but just to tell it as it is

Thank you again

Yours sincerely



## **SUBMARINE DISMANTLING PROJECT.(SDP)**

Having read and listened to your vision for the dismantling of the redundant nuclear submarines, I have no problem with the initial project. The need for the dismantling has to be achieved sooner than later with the expense only going to increase which eventually comes down to the tax payer

With no high level repository in view and most probably not for some time in the future, so the Reactor Pressure Vessel(s) are going to have to be stored in a safe environment, this to me means extra expense for the "Interim Store(s)", possible planning and surveillance. All this extra expense has to be taken into account from the savings from the reason for dismantling the submarines in the first place.

Having being associated with the nuclear industry for over 40 years and with the industry now over 60 years old and with a repository no nearer in concept today than what it was in 1950.

Will the interim store built today still be in use 60 years into the future, for no government it would appear have the initiative or push to make a safe repository happen with result the savings made in dismantling the submarines will be lost in the cost of surveillance and maintaining the interim stores and contents.

To sum up, unless we have a repository soon the proposed savings will slowly slide in to a financial burden to the tax payer once again

Details required on page 48;-

[REDACTED]

[REDACTED]

[REDACTED]



09 FEB 2015

Dear sir/madam,

Ref: Public consultation, submarine dismantling project.

I received the consultation letter concerning the above project, but did not attend any of the meetings held in my local area as I was unable to envisage what additional information you could provide to that given in the consultation letter. However, I do have a comment on the proposed potential sites for storing the RPVs. I would suggest that the RPVs be stored in the sites nearest to the places where the submarines will be dismantled i.e. Burghfield or Aldermaston for submarines dismantled at Devonport, and Chapelecross for submarines dismantled at Rosyth. This would reduce the distance that the RPVs have to be transported, and thus any potential dangers arising from their being transported.

Yours,



Mr Philip Dunne  
Ministry of Defence  
Whitehall  
London  
SW1A 2HB

15 February 2015

Dear Mr Dunne

**RE: STORAGE OF NUCLEAR WASTE FROM SUBMARINES AT AWE SITES**

We live near the AWE sites in West Berkshire, and we object for these two sites to be selected for the temporary storage of nuclear waste from decommissioned submarines by the MOD.

We are very concerned about the large scale of operations that already exist at these two establishments that are used to manufacture nuclear weapons. AWE sites also act as nuclear dump sites for a nuclear waste.

We object to submarine waste storage at these two sites on the following grounds:

1. There have been numerous safety incidents at AWE. In 2010, fire broke out in the explosives processing area resulting in evacuation of nearby residents. According to an investigation carried by Basingstoke Gazette, 158 fires broke out over the period from 1 April 2000 – to 5<sup>th</sup> August 2011 at AWE sites with the fire brigade being called to deal with alarms on average four times a week over this period. These sites have extremely poor safety records.
2. In a recent court case, AWE plc was fined for significant failings relating to its use and control of explosive materials.
3. Radioactive waste from other MOD sources already stored at AWE sites. AWE promised in 2007 to reduce the waste by February 2014 but has not done this. Atomic Weapons Establishment has been issued with non-compliance notices by Environment Agency over handling of hazardous waste. Like all private companies undertaking government work, AWE is more interested in pursuing profits than spending large amounts of money on safety.
4. AWE sites are situated in a very densely populated area that is located in close proximity to metropolitan towns such as Reading, Newbury and Basingstoke. The density of population in the area is 684 people per square km. The density of population on the other proposed sites are much lower: 73.4 people per square km in Cumbria, 32 people per square km in Cheshire.

5. AWE sites are located close to London. In the case of any terror attack, explosive or airplane strike or other disaster, a large number of population will be effected and require evacuation.

6. Environmental Agency has reported that AWE has been releasing nuclear components into the stream impacting the environmental.

Since 2010 safety and environmental regulators have increasingly had to take action at the Atomic Weapons Establishment. It is the responsibility of the MOD to ask whether AWE is fit to run the complex and hazardous site as they are unable to improve standards.

It will be irresponsible and negligent of the MOD to consider AWE sites for storage of more nuclear waste. Considering the danger it presents to the environment and the local populations these sites must be reduced and subsequently closed.

Following our research, the Sellafield site in Cumbria is the best place to store nuclear waste from the decommissioned submarines.

Yours sincerely,



Subject: Radioactive submarine waste

Hi,

I would suggest you send your radioactive submarine waste to Sellafield, where it will be safely, reprocessed and stored safely.

We already have a submarine waste handling facility Regards

To: ZZ\_SDP

Subject: Storage of materials from MOD submarines at Capenhurst

Dear Sirs,

As a local resident I would please like to register my objection to the proposal for materials from decommissioned submarines to be stored at Capenhurst.

I recognise the need for nuclear energy past, present and future and appreciate the difficulties associated with the disposal of radioactive waste. I also recognise the high level of expertise and excellent safety record held in the UK, however recent press coverage of failures to act

responsibly at Sellafield demonstrate that there is a small but feasible chance of accidents

occurring. There is also a rapidly evolving terrorist threat looking to inflict maximum possible

harm to the UK population.

Due to these factors, no matter how unlikely they are to occur, I believe that it is negligent to

expand activities at Capenhurst simply due to the sheer number of people living in the immediate

vicinity and across the wider area (including the cities of Liverpool and Chester). I would also

like to draw attention to the fact that Redrow Homes are soon about to commence building up to

2000 new homes immediately adjacent to the site.

Yours sincerely,

Subject: Public Consultation Response

As a resident of the Sellafield area and given:

1. Retention in their current locations is not desirable
2. The antipathy of the Scottish Government
3. It will add a negligible additional off-site risk to that which already exists here
4. The presence of existing Beta-Gamma ILW stores at Sellafield

I support the transfer of the RPVs to Sellafield, subject to a Government commitment to compensatory infrastructure benefits in the local area. A proper hospital with an A&E closer than 1.5 hours away, or a road to get to it would be good.

To: ZZ\_SDP  
Subject: Submarine Dismantling Project

Dear Team,

In November I attending your interesting exhibition and workshop at Burghfield Village Hall.

I didn't get round to leaving any comments other than those I made in the workshop.

I think that my view over the project was well summed up by a comment from a neighbour who was also looking at the exhibition i.e. "it's a lot of fuss about nothing". There was clearly a lack of understanding from a few members of the public who were there but I found the explanations clear and the safety concerns low.

My only worry over the consultation workshop was an apparent lack of understanding about formal risk management from the team leader, but this was addressed by another team member.

Given the other activities that occur on the AWE Burghfield site, I feel that objecting to the building of a large shed to store some slightly warm lumps of metal is like complaining about your neighbour's new Yorkshire Terrier that they are planning to take for a walk just once a year, even though they have five rabid Alsations chained up in their back garden.

If the AWE Burghfield site is chosen then I recommend checking the route carefully due to the rail and canal bridges on the way from the M4. It might also be wise to extend the consultation to cover those in Calcot who may be affected by the annual movement of parts to the site.  
Thanks,

# **Annex I: Advisory Subgroup Reports**

---

**Notes**

# **Submarine Dismantling Project Advisory Group Sub Group: Report on the MOD Interim Storage Site Selection Consultation Process and the role of the Sub group.**

## 1: Background

The SDP Advisory Group (SDPAG) was established in 2006 to provide independent advice and scrutiny to the MOD in the development of the project to dismantle 27 redundant nuclear powered submarines. The group consists of representatives from a wide range of organisations with an interest: Local Authorities and their national organisations, Non-Governmental Organisations, Community Based Organisations, regulators, academics, industry and industry organisations.

In order to be able to respond to the needs of the SDP programme, the SDPAG nominated members to form a sub group to provide advice, independent challenge and review of the Submarine Dismantling Project's plans, documents and proposals. The SDPAG Sub Group operated during the SDP national consultation held in 2012.

## 2: The SDPAG Sub Group

A skills analysis of the Sub Group was carried out at the end of the 2012 consultation to prepare for the national consultation on the Interim Storage Site selection process and nominations were sought from the SDPAG. There were seven members from the previous Sub Group and two additional members were nominated:

- Les Netherton: Independent consultant and Chair of SDPAG.
- Andy Daniel: Industry representative.
- Di McDonald: Non- Governmental Organisation.
- Paul Dorfman: Academic.
- Philip Mathews: Nuclear Legacy Advisory Forum (NuLeAF)
- Shelly Mobbs: Ex Health Protection Agency now independent consultant.
- Sean Morris: Nuclear Free Local Authorities (NFLA).
- George Hunter: Ex Scottish Environment Protection Agency (SEPA) now independent consultant. (new nomination)
- Stephen Haraldson: Nominated by the Nuclear Institute. Stephen could not take up the position because of potential conflict of interest due to a potential site.

Les Netherton was appointed by the members as Chair for the meetings. The Group operated under Non Disclosure Agreements due to the confidential nature of the information and the fact that the MOD shared documents and proposals at a very early draft stage in order to gain the Sub Group input and advice.

The Sub Group nominated three observers to attend MOD consultation events in order to observe the way the consultation and decision making process was being run, note key issues being raised and provide early advice and comment to the SDP team. The observers were not involved in responding to the consultation and there were no potential conflicts of interest. The observers were: Paul Dorfman, Shelly Mobbs and Les Netherton. Jane Tallents from the SDP Advisory Group attended one consultation event to meet a specific need. The observers attended the National Stakeholder Briefings, the National Workshops, a selection of local events and a MOD workshop for its Multi Criteria Decision Analysis. A detailed report on each event is given later.

### 3: Overall view of the consultation and the process

The sub group are satisfied that an effective, fair and open consultation process has been carried out by the MOD. The SDP staff are to be commended for their openness and the manner in which they involved and responded to the Sub Group. There are a number of good learning points and examples of good practice, for example: local factsheets, pre-engagement to improve formal consultation, model of store design, flexibility to provide additional briefings when requested, independent observation and feedback and the establishment and operation of the Sub Group itself.

### 4: The SDPAG Sub Group meetings and work

The Sub Group met 12 times from January 2013 to June 2015, usually at Abbey Wood in Bristol. The MOD circulated draft documents in advance of meetings for Sub Group members to review and then discuss at the meetings. Update briefings were given and future plans and proposals were discussed for comment.

The Sub Group members used their knowledge and experience to guide the development of the process and the documentation and their input offered different perspectives particularly on the likely needs of the public. On occasions the members provided some robust challenge to the MOD. The consultation process and consultation documentation were particularly guided by the Sub Group.

The following key documents were influenced by the Sub Group:

- Approach to Public and Stakeholder Engagement (PSE)
- PSE 1 (Pre Engagement)
- Site Owners Questionnaire
- Criteria and Screening Report
- Consultation Questions: these were significantly improved by the sub group
- Local Factsheets: Members particularly used their site specific knowledge.
- Technical Factsheets
- Supporting information on Reactor Pressure Vessel (RPV) containers, transport and store.
- Supporting information on Planning, Regulation and Permitting.
- The Consultation Document
- Strategic Environmental Assessment (SEA) Scoping and Non-technical Summary

Advice was also given on addressing the complexities of Parent Body Organisations, the Nuclear Decommissioning Authority and Site Licensees.

The design of the consultation events and workshops along with the publicity and list of invitees were guided by the sub group.

The sub group undertook a workshop on the weighting of criteria for the decision making process to provide some sensitivity analysis to the weightings given in the MOD workshop.

### 5: Pre-engagement Workshops

Two pre-engagement events were held by the MOD. The first was held in Bristol in March 2014 and the second in April in Penrith, Cumbria. The stakeholders were representatives from interested bodies around the five potential sites. The workshops were designed to brief local stakeholders on the issues, the proposed assessment and consultation.

The workshops and material were developed with the assistance of the SDPAG Sub Group. Two observers from the SDPAG Sub Group attended each event and gave feedback to MOD during and after each event.

The observers considered that both workshops were well run with the MOD presentations remaining neutral and not selling the project or any site. Discussions were excellent with the stakeholders raising pragmatic issues but refraining from focussing on the pros and cons of any site. Observers noted that SEA issues were integrated into the presentations and that comments by participants were accurately recorded.

After the first workshop, the observers raised a number of issues with the MOD over the order of presentations, introduction of MOD personnel and observers and clarity on the aims of the workshop to ensure that it was not seen as part of the formal consultation. The observers also kept note of the key issues raised by stakeholders for feedback to MOD. These were: direct disposal of RPVs, RPV cutting up, community benefits, transport routes and planning issues.

MOD addressed all the observers' comments on the workshop and the second workshop worked well. Observers again took note of key issues for early feedback to MOD. These were: community benefits, role of the Site Licensed Company/Parent Body Organisation, size reduction site, Scottish radioactive waste management policy, transport, security and the need for early engagement with stakeholders.

#### **Conclusions and learning points:**

It is the view of the observers that the pre-engagement was a useful process, improved the final consultation and was an example of good practice. However, care was needed to ensure that it was clear that it was not part of the formal consultation. The observers also considered that MOD effectively delivered the workshops in an unbiased way with accurate recording of stakeholder issues. Suggestions raised by the observers were implemented.

The knowledge and experience of the SDPAG Sub Group of stakeholder issues and reactions assisted in the design of, and the material for, the workshops. The observer feedback improved the second workshop. The observers recorded key issues from each workshop which allowed the MOD to start work early to address them in advance of the more detailed report of the workshops prepared by Instinctif.

#### **6: National Stakeholder Workshops**

Two National Stakeholder workshops were held in January 2015 as part of the consultation process to allow issues to be discussed from a national rather than local perspective. The first was held in Birmingham and the second in Glasgow in order to allow reasonable easy access. Two SDPAG Sub Group observers attended each of the workshops and observers also attended two earlier training sessions for presenters at the workshops.

The SDP AG Sub Group had been closely involved in developing the detailed design of the workshops, the local and technical factsheets and the list of organisations to be invited. Observers gave feedback to MOD at the end of each workshop on issues raised and suggestions on improvements for future workshops.

#### **Conclusions and learning points:**

The observers considered that the workshops were successful, well run and that comments made by participants were accurately recorded. The sessions were facilitated by independent consultants who managed the process well and remained neutral. The displays were professional and based on the factsheets. The presence of regulators, naval staff, subject matter experts and key operational MOD staff was considered to be a particular benefit. The presenters dealt with queries and did not try to "sell" any site or the project. The MOD made it clear that individual briefings could be made if requested and at least one local authority took up the offer. A number of organisations around the sites attended and these

workshops gave them the important opportunity to hear the views being expressed by others.

The observers noted some points for future reference in any similar workshops. There is a need to introduce key speakers and supporting staff (including observers) at the start and also the attendees at each workshop session. This encouraged more openness and understanding of points being made. The MOD training sessions and final slide preparation was rather last minute which is not good practice and showed up in spelling mistakes in the slides and some minor areas of conflict. One example was in the need for repackaging of RPVs which differed between the SEA and Planning and Permitting presentations. Participants need to be actively reminded and encouraged during the day to attend the exhibition, complete post-its and the response forms. Questions should be thrown back and framed in an open way to the participants in order to encourage them to give their views. These points are particularly important as the National Workshop consisted of four presentations and the day did not fully explore the other wider issues of the project. A brief explanation of the documents available would have encouraged participants to have taken them away for further study. Technical abbreviations must always be explained e.g. ALARP, SQEP. There was an issue for AG members invited, as the start time had changed after the AG invitation letter with no further notification or confirmation.

**Issues noted requiring further detail:**

The observers noted the following points raised which the MOD will need to bear in mind as it carries out more detailed work and analysis: size reduction assumptions, sea transport, impact of 40 years decay of ILW, impact of delay of the Geological Disposal Facility, repackaging, dose rates and transport packaging design

7: Local Public Exhibitions:

Local public exhibitions were held around each of the five shortlisted sites. SDPAG observers attended the following events: Aldermaston (17/11/14), Burghfield (18/11/14), Chapelcross (28/11/14), Capenhurst (9/12/14) and Sellafield (17+18/12/14). Two observers attended each event except for Sellafield where only one observer was available. Another member of the Advisory Group was asked to attend a second exhibition at Chapelcross in January 2015 in order to give a different perspective due to the challenging nature of the earlier exhibition. Observers monitored the exhibitions and attended the workshops at each site. Feedback was given to MOD on suggestions for improvement and key points raised.

**Conclusions and learning points:**

The premises used for the exhibitions were acceptable, accessible and reasonably convenient for the public. The exhibitions were manned by project staff, naval staff, subject matter experts and key operational MOD staff who were considered to be a particular benefit to the public. Regulators were also present. Staff handled visitors' queries very well and remained neutral. The exhibition in Annan (for Chapelcross) was particularly demanding due to a very vocal local objector who at one stage was interfering with other visitors' ability to move around the exhibition. MOD handled the situation very well and subsequent exhibitions ran successfully with less interference. A second exhibition was observed by an AG member from Scotland.

The displays were professional and helpful to the public. The model of a potential store design was considered to be extremely useful in allowing the public to visualise the store and ask questions. The technical and local factsheets were also noted to be particularly useful to the public, although on one site they could have been more obviously displayed. Space had been allocated at the exhibitions for groups with alternative views to be able to display material; this was a recommendation of the sub group. At Capenhurst, a table was

taken by CNS which operates the shortlisted site. Observers noted the public found this useful in that many seemed unaware of the extent of the activities being undertaken there and it assisted in gaining a better understanding of the potential impact of the SDP proposal. A note of caution must be made in that the presence of companies or groups must always be full explained to the public, particularly if representatives attend workshops in order to prevent confusion. Time was allocated at each exhibition for local councillors and community representatives to attend before the public. Observers considered this to be useful especially combined with the separate briefings to workforces and community representatives given by MOD.

The workshops were well presented and facilitated with notes of the points raised being noted. Some of the workshops only had a few public attend and they were outnumbered by consultation personnel and observers. This could be intimidating and observers recommend that official staff be reduced to an appropriate size to match the audience, experts can always be called in if there is a specific technical issue.

**Issues noted:**

Observers noted the following key issues raised at the consultation events: transport routes, benefits, resilience of store to attack or airplane crash, security, size reduction, dose, impact of delays the Geological Disposal facility, storage of other materials in the store and repackaging details.

8: MOD Operational Effectiveness Criteria and Weighting Workshop

Two observers attended this workshop which was held in April 2014 with MOD specialist staff and technical informers. The workshop weighted the criteria used within the Multi Criteria Decision Analysis by the presentation of criteria, card allocation of personal weighting, review and then final individual weighting. Results were recorded and sensitivity testing would be carried out.

Observers felt that a fair process was followed with a wide range of weightings being allocated by the various MOD staff and recorded. Observers raised concerns over the criteria for flexibility and the need to be specific on this issue at the public consultation as there was a conflict with the information given at the Pre-engagement Workshops. Further clarification was also need on how to treat dose within the process and consultation.

A weighting exercise in order to improve sensitivity testing was carried out with the SDPAG Sub Group members in June 2015. Issues around dose and flexibility for future generations were raised and challenges from the sub group helped the MOD to clarify exactly what the criteria represented.

Observers will be involved in future MOD workshops on Other Contributory Factors and the MCDA later in 2015.

## **Annex J: Statistical Breakdown**

---

### **Notes**

This annex contains a breakdown of the individual points made within responses to the consultation. See Part B of the main document for details.

## General Comment Area

Project scope and key stages	561	23%
Assessment process & options	544	23%
Strategic Environmental Assessment	348	15%
Public & Stakeholder Engagement	311	13%
Site suitability *	231	10%
Safety & security	222	9%
Planning, policy & permitting **	172	7%
	<b>2389</b>	<b>100%</b>

\* Includes negotiated benefits. Socio economics more generally covered in Assessment.

\*\* Points relating to specific sites not covered under the other headings

## Project scope and key stages

GDF disposal	85
RPV Store	77
Scope	62
Transport arrangements	62
RPV characteristics	43
Other radioactive waste	43
Size reduction	42
Programme	30
Container	29
Wider submarine issues	27
Initial dismantling	25
Future classes	21
Repackaging	15
	<b>561</b>

## Assessment Process and Options

Assessment framework	88
Assessment of socio-economics	77
Site/storage options	71
Assessment process	66
Assessment of politics	54
Assessment of transport mode	48
Commercial Issues	32
Assessment of population	28
Assessment of on-site location	25
Existing storage	23
GDF in Assessment	17
Decision maker	15
	<b>544</b>

### Strategic Environmental Assessment

Local transport	162
SEA Process	60
Flooding issues	38
Land/townscape & heritage	21
Other environmental effects	24
SEA Scope	18
Radiation & discharges	16
Monitoring	9
	<b>348</b>

### Public & Stakeholder Engagement

Local exhibitions	84
Future PSE	61
PSE Process	56
PSE documentation	51
Publicity arrangements	27
Other local PSE issues	17
PSE input to assessment	10
PSE venues	5
	<b>311</b>

### Site suitability

	ALD	BUR	AWE	CAP	CHX	SEL
Existing facilities	0	8	0	17	5	18
Future plan	1	0	0	0	39	13
Other issues	1	0	1	4	1	6
Not suitable	2	5	11	10	33	8
Suitable	15	2	1	4	7	19
	<b>19</b>	<b>15</b>	<b>13</b>	<b>35</b>	<b>85</b>	<b>64</b>
				<b>Total</b>		<b>231</b>

### Safety & security

Store Safety	108
Security	67
Safety Management	26
Transport Safety & Security	16
Worker Safety	5
	<b>222</b>

### Planning, policy & permitting

Planning regime	74
Negotiated benefits	59
Permitting	32
General issues	5
Nuclear Site License	2
	<b>172</b>







Ministry  
of Defence

