

DICK FRANCIS RESPONSE TO THE RWM GDF CONSULTATION DEADLINE 4 DECEMBER 2015

Q1: To what extent do you think our proposed approach to providing national-scale existing information about geology relevant to long-term safety is appropriate?

I consider the proposed approach to providing national-scale information about geology relevant to long-term safety is appropriate - because it comprises a detailed, transparent and sequential process, with consultation (at all stages) being fundamental to that process. In addition the process is firmly based on the use of British Geological Survey (BGS) data and BGS is the organisation most likely to be accepted as the appropriate, definitive and expert source for the UK.

However, although the current documentation is very good, there is scope to further enhance the clarity of the introductory aspects. My thoughts are set out below:

- > Explain exactly and briefly what a GDF is and, in particular, that it will be 'passively safe' (not requiring human intervention in order to maintain safety).
- > Explain that there is realistic scope for finding a GDF solution in the UK, because we can show that some underground formations have been stable for many millions of years (isotope ratios and other methods). I say this because even with a nuclear background, I still tend to think that implementing a GDF might not be possible, given the huge timescales that are discussed in the documentation.
- > Explain the term 'screening' up front - in very brief and clear terms. I have attended two public consultations, separated by some months. At both events it was evident that there is still major confusion about this term. I appreciate that you have to use it because it is enshrined in Government documents. However it is very important to make clear that screening is about assessing and presenting existing geological information, as part of a sequential, publicly consulted and transparent process. 'Screening' in this context is specifically not about being sneaky and selecting a GDF site before anyone has noticed what is going on!!
- > It would enhance the effectiveness of the written material if there could be a further review of the consistency and clarity with which information is presented. A particular example is shown here (in two extracts from National Geological Screening Guidance Appendix 2). We are told that a suitable host rock must have sufficient volume and be deep enough to ensure that the waste remains isolated from the surface environment for hundreds of thousands of years. However, an earlier paragraph states that 'water there today has been there for tens of thousands of years at least'. Presumably both these statements are true in the overall geological context but, to a typical non-specialist reader, we seem to have jumped a factor of 10 in the time period that might be realistically achievable.

Q2: The proposed sources of information are summarised below [Table]. To what extent do you think that these sources are appropriate and sufficient for this exercise?

The proposed sources of information are most appropriate and are also sufficient for this exercise. The BGS is a world renowned and respected organisation. The use of BGS information will enhance the technical and procedural credibility of the overall geological screening process.

Q3: To what extent do you agree or disagree with the proposed form of the outputs from geological screening? What additional outputs would you find useful?

The proposed form of outputs (the tiered approach) is fine. However it seems that Local Authorities do not typically have the expertise to judge the suitability of a data provider or to assess information provided. Neither do they have funds for the provision of independent assistance in these matters. It would therefore be beneficial to the geological screening process if some kind of statement could be added to the documentation - recognising this as a fair point and indicating what (if anything) might be done to ensure that such Local Authorities can respond adequately.

In presenting geological screening documentation, there could be benefits in seeking the services of independent presenters. The challenge will be to work out how such people are most likely to be seen as un-biased 'honest brokers'.

Q4: Do you have any other views on the matters presented in the draft Guidance?

Bearing in mind the potential confusion about the word 'screening' (as noted under question 1 above), it would be helpful (as a means of reassuring people) to briefly and clearly set out the decision gates in the overall GDF process including when and how regulators would be involved.

It could be worth clarifying that while it is not a simple matter as to who owns the deep land rather than the surface - it can be said, in general, that a surface owner also owns the depths below that surface.

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I am happy for my response, including name and contact details, to be publicly available.

Dick (R.J) Francis

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