

## **Annex A: Response form for the consultation document on revised Funded Decommissioning Programme Guidance for New Nuclear Power Stations**

You may respond to this consultation by email or by post.

Please note that if you accessing this document electronically you will only be able to enter text in the response fields.

<b>Respondent Details</b>	
Name:	
Organisation:	Cumbria County Council
Address:	
Town/ City:	
County/ Postcode:	
Telephone:	
E-mail:	
Fax:	

### **Please return by 8 March 2011 to:**

Revised FDP Guidance Consultation  
Office for Nuclear Development  
Department of Energy and Climate Change  
Area 3D  
3 Whitehall Place  
London  
SW1A 2AW

You can also submit this form by email:  
[decomguidance@decc.gsi.gov.uk](mailto:decomguidance@decc.gsi.gov.uk)

Tick this box if you are requesting non-disclosure of your response. ☐

<b>Consultation questions</b>	
<b>1</b>	Do you agree or disagree that the draft guidance sets out what an approvable Funded Decommissioning Programme should contain to ensure that operators of new nuclear power stations (i) estimate the potential costs of decommissioning, waste management and waste disposal and (ii) make prudent provision for meeting their liabilities? What are your reasons?
<b>Response</b>	<p>The County Council's Nuclear Issues Working Group has considered the revised proposals for a funded decommissioning programme. The Working Group agrees that on closure of a new nuclear station the responsibility for funding waste management, decommissioning and disposal should be assumed by the Decommissioning Fund built up over a nuclear plant's operating life (assumed to be 40 years though it could extend to 60 years). The Working Group agrees that independent fund managers should monitor the level of actual funding against a fund's Target Value and they should act to ensure underfunding or overfunding is rectified by increasing or decreasing fund contributions. The Target Value would, of course, also need to be reviewed periodically to maintain confidence that it will be sufficient to cover the in scope costs.</p> <p>The Working Group considered the revised guidance appeared to be robust though it could be further strengthened by the additional measures recommended in the County Council's response to the March 2010 FDP consultation, as follows:</p> <ul style="list-style-type: none"> <li>• funding requirement should be based on worst case scenarios for foreshortened operation and extended liabilities management pending the availability of a GDF. Disposal facility geological and site specific information and an assured timeframe is not yet available to give any precision to disposal costs.</li> <li>• operators should insure against the risk of a funding shortfall for decommissioning, waste management and final disposal.</li> <li>• funds for sites operated by the same owner should be pooled to spread risk.</li> </ul>
<b>2</b>	Does the draft guidance contain sufficient information to enable operators of new nuclear power stations to understand the matters that their funded decommissioning programmes should contain?
<b>Response</b>	Yes, the County Council considers the draft guidance provides sufficient information.

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

- ☐ Business representative organisation/trade body
- ☐ Central Government
- ☐ Charity or social enterprise
- ☐ Individual
- ☐ Large business ( over 250 staff)
- ☐ Legal representative
- ☒ Local Government
- ☐ Medium business (50 to 250 staff)
- ☐ Small business (10 to 49 staff)
- ☐ Micro business (up to 9 staff)
- ☐ Trade union or staff association
- ☐ Other (please describe):

Thank you for taking the time to let us have your views. The Government does not intend to acknowledge receipt of individual responses unless you tick the box. ☒

Department of Energy and Climate Change