

Response to FDP consultation question 1

- A key factor in the costs for disposal is that a repository for legacy *and* new build wastes will be built - to schedule and to cost. These are major assumptions, not guaranteed outcomes.

It was 1991¹ when the government initially set out to build a GDF, at the time the government indicated that the GDF would be open by 2005 at a cost of £2.5-£3.5 billion. It is now 2011 and the then governments planned GDF is no closer to materialising than it was in 1991.

The following is an extract from the NWAAs issues register which calls into question the evidence base for the NDA's waste management policies:

“In the autumn of 2008, the Planning Inspector for the Cumbria County Council’s Hearing on the draft ‘*Minerals and Waste Core Strategy and Development Control Policies*’ (the ‘Waste Planning Framework’) requested that the NDA present a Submission indicating whether their waste management policies were based on “*a robust and credible evidence basis?*”²⁵⁹

The NDA were unable to provide a coherent response.²⁶⁰

Specifically the NDA response was as follows:

*“The repository has a new Parent Body organisation with seconded management team, not a new operator, and the proposals do not **demonstrate** that wastes will be managed elsewhere, just that strategically, every effort will be taken to apply fit-for-purpose management to wastes that are currently expected to be disposal [sic] at the Repository to make optimum use of the national asset, as per Government Policy.”*

It can be seen that this makes no sense in terms of the question of the existence of: “a robust and credible evidence basis” ”²

When considering the recent presentation by the NDA (July 10) about “A worldwide perspective on geological disposal” It is clear from this presentation that although nearly all of the 41 countries that have generated nuclear waste are nearly all signed up to the idea of GDF (it is politically expedient to give the public the impression that there is a solution), not one country has adopted this as a policy. Furthermore the presentation also makes clear that one of the furthest progressed of all the GDF concepts Yucca mountain, originally identified as a site in 1982, nearly 20 years later has just been turned down for a license so the issue will now be considered by Congress. ³

In the UK the government are trying to implement a policy of voluntarism, the only problem at the moment is that the only local authority that has come forward to volunteer its community is that of Cumbria, an area that has already been investigated and its geology found to be unsuitable ⁴

I would therefore conclude that the governments assumption that **the costs for disposal is that a repository for legacy *and* new build wastes will be built - to schedule and to cost** are grossly overestimated and that the governments “belief” that such a GDF will exist ⁵ is overstated, not only is it overstated but it is intentionally misleading to the public as there is no real scientific basis for the government to hold such a belief.

Furthermore, these assumptions are not guaranteed outcomes, nor can they ever be. The estimated costs of decommissioning are consistently revised upwards, the NDAs most recent estimates of £73 billion in 2008 represent a 30% increase on 2003s best estimate at the time. ⁶

Given the historic trend for huge increases in these estimates one can conclude that Government and the nuclear industry are constantly over-optimistic about decommissioning costs at the expense of not only the taxpayer but also at some time in the future this may well also be at the expense of public health & safety (look at the state of the infrastructure at Sellafield which has had numerous problems with its HAL & HASTS).

It therefore follows given my comments above, that the assumptions about the Governments base case being unrealistic leaves me no alternative than to say that **my answer to question 2 of this consultation also has to be no.**

Given that I don't feel that the governments FDP guidance is realistic because of the assumptions about the base case, I also feel that this means that the guidance on waste transfer pricing methodology is fatally flawed. Therefore I'm not going to make extensive argument about some of the finer points about the body of the two sets of guidance, lother than to make the following points:

- That there should not be a 'cap' on the waste transfer price, the industry must be made to pay the full costs of disposal - that means no settling of the price until and unless disposal takes place.
- Offering a maximum cap before construction, but also deferring the final 'waste transfer price' for 30 years, presents too much of a risk of companies not being in a position to fund their waste and spent fuel liabilities and risks taxpayer funding for any shortfall.
- That the Guidance should state that no FDP can be agreed with the SoS and industry without public input or Parliamentary oversight.
- That modifications to any agreement which impact significantly on funding, or the practical arrangements concerning decommissioning, waste and spent fuel management and disposal, must be open for public input and Parliament scrutiny.

References

- 1 - <http://www.guardian.co.uk/environment/2008/jan/10/nuclearpower.energy>
- 2 - <http://www.westcumbriamrws.org.uk/documents.asp> .>f. issues register published by Nuclear Waste Advisory Associates
- 3 - <http://nicumbria.org/resources/NIJULY2010Sellafield+Web.pdf>
- 4 - <http://www.getnoticedonline.co.uk/news/general-news/thirteen-years-on-nirex-report-makes-compelling-reading.html>
- 5 - [https://www.energynpsconsultation.decc.gov.uk/docs/EN-6-RevisedDraftNuclearNPS\(Volumel\)-October2010.pdf](https://www.energynpsconsultation.decc.gov.uk/docs/EN-6-RevisedDraftNuclearNPS(Volumel)-October2010.pdf)
- 6 - [http://www.inthenews.co.uk/news/science/-73bn-nuclear-decommissioning-costs-may-rise--\\$1231030.htm](http://www.inthenews.co.uk/news/science/-73bn-nuclear-decommissioning-costs-may-rise--$1231030.htm)