

ENVIRONMENT

Lonsdale Building • The Courts • Carlisle
Cumbria • CA3 8NA • Fax 01228 606728
Tel 01228 226688 • Email charles.green@cumbriacc.gov.uk

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NDA Business Plan Consultation
FREEPOST SEA 12430
Thornton Heath
CR7 7XT

Dear Consultation Facilitators

Cumbria County Council's response to the NDA Consultation on its Draft Business Plan 2009-2012

The County Council Nuclear Issues Working Group meeting on 13 January 2009 agreed a response to the Draft Business Plan 2009 – 2012 in the following terms:

Delivering NDA's Mission

1. Improved benchmarking in the current draft Business Plan is broadly welcomed. The commitment (p15) to further develop with Government and regulators: the framework to deliver the NDA's mission; to continue work on strategic environmental assessment in support of the NDA strategy review; to establish a programme of 'best practice' conferences; and develop a suite of leading safety, performance indicators to further encourage a more proactive safety culture, are all broadly welcomed.

Socio Economic Spend

2. NDA continues to cap total socio economic spend across its estate at £10 million per year (p23). This represents a continuing decline in real value. NDA also recognises (p10) that they will be facing a 'tight fiscal environment' in the coming year. The County Council Nuclear Issues Working Group reiterates concerns expressed by County Council Cabinet last year about the need to restore the value of NDA socio economic support and, in the current economic climate, provide an assurance that this spend will be protected. A commitment (p23) to: "...further develop the partnering arrangements with agencies that have lead responsibility for socio economic development" is very welcome and consistent with the County Council's view that locally the NDA socio economic engagement should interface with the socio economic development delivery framework in Cumbria.
3. The location of ENERGUS in West Cumbria has been widely welcomed and will make a significant socio economic contribution. The establishment of the Dalton Cumbria Facility and NDA support for the University of Cumbria is also welcome, as is the commitment to investment in skills for the future (p24) to support the NDA's mission. However, budget provision for investment in skills is down in 2009/10

to £7.6m compared with £9.9m in 2008/09. The County Council Nuclear Issues Working Group asks for clarification about the reasons for this budget cut.

Sellafield Site

4. The budgeted spend at Sellafield in 2009/10 is £1,168.9m – down from the budgeted spend for 2008/09 of £1,296.2m. Projections (p33) for 2010/11 suggest expenditure will continue to fall away.

Hazard Prioritisation

5. The County Council Nuclear Issues Working Group agrees that the NDA's top priority (p33) should continue to be the 'high hazard legacy facilities' at Sellafield. Continued reduction of the stock of highly active liquors (HAL) (p16) that has arisen from reprocessing campaigns at Sellafield is welcome. The draft Business Plan reports (p35) that HAL stocks have reduced to 904m³. Current stocks are well below the HSE imposed 'stock reduction curve' that requires accumulation of HAL to be reduced to 'buffer stock' levels of 200m³ by 1 July 2015. However, the County Council Nuclear Issues Working Group seeks clarification from the NDA about how the HSE 2015 deadline will be achieved should both THORP and MAGNOX reprocessing lines continue to operate well into the next decade.

THORP & SMP

6. THORP operation continues well below the plant design throughput of 700 tonnes of spent fuel per year. The NDA draft Plan projects throughput in 2009/10 of about 200 tonnes. The draft Business Plan reports (p33) that the review of the operation of the poorly performing Sellafield MOX Plant will be published in '2008/09'. The future of the THORP and MOX plants impact on the economy of West Cumbria and the County Council Nuclear Issues Working Group requests an early briefing from NDA on progress with the reviews of the future operation of both plants.
7. The draft Plan refers (p33) to positioning Sellafield for 'external or new missions'. The County Council Nuclear Issues Working Group seeks an early meeting with the NDA and the new site owner, NMP Ltd, about mission proposals and options and how these may impact on the current Sellafield site Lifetime Plan (LTP) and Site End State.
8. The draft Plan also reports (p22) that the LTP will be reviewed and updated. The County Council Nuclear Issues Working Group wishes to be consulted at an early date about this.

Low Level Waste

9. LLWR spend in 2009/10 is expected to be £29m. This is down from the figure for 2008/09 of £31m. The County Council Nuclear Issues Working Group would welcome explanation for this reduction.
10. Work continues on the LLWR post closure safety case (p65). The County Council Nuclear Issues Working Group has received a presentation about this and will seek from LLWR Ltd and the Environment Agency a further update before the end of 2009.

11. The County Council Nuclear Issues Working Group welcomes the NDA commitment to the application of the waste hierarchy (p21) before considering LLWR as a storage/disposal option. This is in line with draft policy in the Minerals and Wastes Development Framework. However, the County Council Nuclear Issues Working Group is concerned that 'flexibility' in Very Low Level Waste disposal (p21) may result in increased use of non nuclear facilities. This may cause concerns in local communities neighbouring non nuclear facilities because the public does not always discriminate between different waste categories. Public perception of waste management practice is one area e.g. VLLW disposal to landfill may impact on the perception of operations in other areas e.g. storage/disposal at the LLWR or development of a geological disposal facility. This matter will be raised by County Council officers that participate on the NDA Low Level Waste National Strategy Group.

Interim Waste Storage

12. The draft NDA Business Plan (p21) overlooks the role of local authorities as community representatives. The key role of local authorities needs to be recognised alongside central Government, devolved administrations, and regulators, to deliver a strategy for interim storage of higher activity wastes.

Nuclear Materials

13. Future management of the stockpile of separated plutonium on the Sellafield site could impact significantly on the Cumbrian economy and environment. The County Council has previously given its support to the principle of converting plutonium into MOX fuel for burning in dedicated reactors on, or adjacent to, the Sellafield site. The County Council Nuclear Issues Working Group seeks a briefing at an early date about NDA recommendations to Government for a UK plutonium disposition strategy (p21).

MRWS

14. The County Council Nuclear Issues Working Group reiterates the view of County Cabinet last year, that the NDA MRWS budget should be ring fenced to reduce risk in the delivery of the geological disposal facility (GDF) work programme. Any budget cuts to the NDA GDF work programme would introduce risks to overall programme delivery and could damage public confidence.

Transportation

15. The 2008/09 Business Plan identified the end of 2008 for commencement of 'vitrified residue return'. These shipments have not yet begun and the draft 2009/10 Business Plan (p34) now identifies 2009 for commencement. In its response to the 2008 -11 draft Business Plan, County Cabinet called for advance notice of impending shipments as these would be controversial and likely to attract environmental protests. The County Council Nuclear Issues Working Group reiterates the call from County Cabinet last year that the County Council be alerted in advance to any proposed sea shipment of vitrified residues.

Corporate Social Responsibility Report

16. A commitment in the 2008/09 Business Plan to produce a CSR report for consultation, which was welcomed at the time by the County Cabinet, appears to be dropped in the 2009/10 draft Business Plan as there is no mention of it. The County Council Nuclear Issues Working Group seeks an explanation from NDA about how this work will be carried forward.

Future Business Plan Consultation

17. NDA propose reducing the formal consultation period in future from 12 to six weeks. At the NDA National Stakeholder Group meeting last November NDA suggested more time could be used for informal engagement with stakeholders at an earlier stage of Business Plan preparation. The County Council Nuclear Issues Working Group accepts the proposal to reduce the formal consultation period on next year's draft Business Plan providing the NDA gives an assurance that there will be early informal stakeholder engagement and that the total amount of time available for feedback to the NDA is not reduced.

Yours sincerely

Charles Green
Interim Corporate Director