

**CoRWM Meeting with Department for Transport,
15 January 2010, London**

Purpose of Meeting

1. The meeting was held to improve CoRWM's understanding of regulatory issues in the transport of new build, existing and committed higher activity wastes (HAW), as input to its 2010-11 work.

Participants

2. The participants were:

CoRWM: Marion Hill, Les Netherton, David Broughton (by telephone).
Department for Transport: Steve Whittingham

Role of Department for Transport

3. Under current legislation, Department for Transport (DfT), in its role as Competent Authority for the transport of radioactive material, only has powers to approve proposed transport packages and arrangements that are submitted to it. In the case of the development of possible future packages and arrangements its role is advisory.
4. Unlike nuclear safety and environmental requirements, transport requirements are entirely prescriptive. There is no overarching requirement to keep risks as low as reasonably practicable (ALARP) or as low as reasonably achievable (ALARA), and there is no use of targets or objectives. This is because UK transport regulations are based on international standards, which are designed to achieve consistency between countries for the transport of radioactive materials across borders and to ensure that the design basis for the safety performance of packages containing radioactive material can be independently verified by any State. Some large countries also have specific requirements for transport within their borders.
5. The role of the relevant parts of DfT will not change when they move into the new Office for Nuclear Regulation that is being formed at HSE later in 2010.

Existing and Committed Wastes

6. For existing and committed HAW that will not be transported for several decades, DfT advice is to package them so that they could be transported under current regulations, with plans to use overpacks if necessary. DfT expects waste producers to have arrangements for monitoring the condition of waste packages in store and for rectifying any deterioration that would make the packages untransportable. Waste producers will be required to provide sufficient evidence of the packaging design and manufacture, its contents and the inspection and storage regime requirements to demonstrate compliance with the transport regulations. It is therefore essential that waste producers keep such records so that they are available at the time of transport.
7. DfT is prepared to advise on any proposals for changes to the International Atomic Energy Agency (IAEA) transport regulations to reflect the needs of the decommissioning sector whilst maintaining acceptable margins of safety. However this initiative must come from waste producers. The time required to develop the changes, evaluate their effects, agree through the international community, agree regulatory text and progress through the UN model and European modal regulations processes should not be underestimated and in some instances this may take as long as 15-20 years from the initial idea.

8. DfT can see value in establishing “Waste and Package Directories” that set out a national protocol to manage and control waste streams and designs of packaging. These would provide a national basis by which all sites can share best practices and resources and enable the geological disposal facility (GDF) to plan waste receipts in the most efficient and effective way whilst maintaining safety.
9. It was agreed that it is important for waste producers (Site Licence Companies (SLCs) and other nuclear site licensees) to identify what infrastructure will be required and what will be available and when, for the transport of HAW from stores to a GDF. There is a need for a single entity to be responsible to examine and challenge the waste producers (including new build – see below) and the GDF from a national perspective to ensure that the planned solutions for the many streams of work over many decades all support a national plan. This is particularly important because the decisions taken now in the early years will have a direct effect upon the number of transports that future generations will have to manage with the consequential environmental and security implications at that time. The single entity would need to bring all the interested parties together to carry out a process of national strategic planning for HAW transport with contributions from waste producers, regulators, other parts of DfT and Local Authorities. Clearly the other recognised stakeholder groups would also be involved as they are at present..
10. Ideally, strategic plans would be formulated for existing, committed and new build HAW. It is essential to identify current infrastructure that needs to be maintained, as well as new infrastructure that will be needed, for transport of HAW from all relevant UK sites to a GDF (or GDFs). It should also be borne in mind that if the private sector is to be involved (eg in providing new rolling stock) it needs certainty about what will be needed and when for the necessary investment programmes to be implemented.

New Build Wastes

11. For new build HAW, DfT is of the view that further consideration needs to be given to the transport logistics and it is concerned that no one organisation seems to be taking a strategic overview of waste management arrangements (as stated earlier). In particular, it considers that there is a need to develop a logistics programme for the delivery of new build spent fuel from interim stores to a GDF. The transport regulations will assure safety but other factors such as noise, nuisance, security, timescales, infrastructure etc will be significant for stakeholders. These factors need to be addressed so they can be taken into account in the transport system and GDF designs.
12. There is also a need for contingency plans if spent fuel has to be moved earlier than expected, for example if it has to be transferred to another store for safety or security reasons. For these plans it will be necessary to bear in mind that it can take 4-5 years to develop a new transport flask and that the number of existing transport flasks will always be limited due to their high cost and utilisation in the business models in which they operate. Also it is likely that additional flask and fuel handling infrastructure may be needed at both the sending and receiving sites and this needs to be factored into the contingency plans.
13. It is not necessary to resolve all the issues in the near future. However, it is important to have a clear idea of the timescale on which they need to be resolved, not least so appropriate R&D can be put in hand.
14. DfT also pointed out that there could be a skills issue for transport of new build spent fuel. If the period for which new build spent fuel is stored at reactor sites is long, there could be a situation in which transport of this spent fuel to a GDF begins many years after there has been any transport of existing or committed spent fuel in the UK.

15. It was noted that transport will affect a much wider range of stakeholders than any other aspect of the management of new build HAW. In the case of transport after power generation has ceased, the stakeholders will have received little if any perceived direct benefits from new nuclear power stations and therefore the transport plans need to be well defined and known for several generations.