

DRAFT CoRWM STATEMENT OF ITS POSITION ON NEW BUILD WASTES**Marion Hill**

This document does not present the views of the Committee on Radioactive Waste Management nor can it be taken to present the views of its author. It is a draft paper to inform Committee deliberations and both the author and the whole Committee may adopt different views and draw entirely different conclusions after further consideration and debate.

Drafting Note: Changes from the draft discussed at CoRWM's January 2010 plenary meeting are highlighted in yellow.

Introduction

1. This statement gives the current position of the Committee on Radioactive Waste Management (CoRWM) on the higher activity wastes that would be produced by new nuclear power stations (hereafter termed "new build wastes", for brevity). Its purpose is to set out the basis for all future CoRWM work on new build wastes. Its issue is timed to coincide with the publication of the Committee's formal response (CoRWM doc. 2748) to the consultation by the Department of Energy and Climate Change (DECC) on the draft National Policy Statement (NPS) for new build nuclear power stations (DECC, 2009a-e).

CoRWM's Terms of Reference

2. CoRWM's current Terms of Reference are to

"provide independent scrutiny and advice to UK Government and devolved administration Ministers on the long-term management, including storage and disposal, of radioactive waste. CoRWM's primary task is to provide independent scrutiny on the Government's and Nuclear Decommissioning Authority (NDA) proposals, plans and programmes to deliver geological disposal, together with robust interim storage, as the long-term management option for the UK's higher activity wastes."

2006 CoRWM Recommendations

3. In its 2006 Recommendations to Government (CoRWM doc. 700) CoRWM made the following statements about new build wastes.

para 21, page 14

CoRWM takes no position on the desirability or otherwise of nuclear new build. We believe that future decisions on new build should be subject to their own assessment process, including consideration of waste. The public assessment process that should apply to any future new build proposals should build on the CoRWM process, and will need to consider a range of issues including the social, political and ethical issues of a deliberate decision to create new nuclear wastes.

para 25, page 15

It must be emphasised that CoRWM's recommendations are directed to existing and committed waste arisings. CoRWM believes that its recommendations should not be seen as either a red or green light for nuclear new build. The main concern in the present context is that the proposals might be seized upon as providing a green light for new build. That is far from the case. New build wastes would extend the timescales for implementation, possibly for very long, but essentially unknowable, future periods.

Further, the political and ethical issues raised by the creation of more wastes are quite different from those relating to committed – and therefore unavoidable – wastes. Should a new build programme be introduced, in CoRWM's view it would require a quite separate process to test and validate proposals for the management of the wastes arising. To that end, CoRWM has issued a statement on new build which is included after the recommendations in paragraph 21.

Current CoRWM Position

Desirability or Otherwise of Nuclear New Build

4. CoRWM's position on the desirability or otherwise of building new nuclear power stations remains neutral. The Committee is neither for nor against new build.

Consideration of Wastes in the New Build Assessment Process

5. CoRWM's position on the consideration of wastes in the public assessment of proposals for building new nuclear power stations remains as set out in para 21 of its 2006 Recommendations (see para 2 above). It believes that a range of issues, including social, political and ethical issues, of a deliberate decision to create **additional** wastes should be considered **as an integral part of** the new build public assessment process.
6. The Committee recognises that there are several strands to the new build public assessment process. Some of these are complete, some are currently underway and some are yet to start. The past and current strands in which wastes have been or are being considered are:
 - the 2007 Government consultation on the future of nuclear power (DTI, 2007), which led to the 2008 White Paper on nuclear power (BERR, 2008)
 - the 2009 Government consultation on the draft NPS (DECC, 2009a-e)
 - the 2009 Government consultation on the results of the "justification" exercise for new nuclear power stations (DECC, 2009f)
 - the joint Health and Safety Executive (HSE) and Environment Agency (EA) Generic Design Assessment (GDA) for new nuclear power stations (HSE, 2009a, b).
7. The strands yet to **come, in which wastes will be considered and** for which there will be public consultations, are:
 - the consideration of applications for development consent for new nuclear power stations by the Infrastructure Planning Commission (IPC)
 - Local Authority planning processes
 - nuclear site licensing
 - environmental permitting.

Testing and Validation of Proposals for the Management of New Build Wastes

8. CoRWM's position on the testing and validation of proposals for the management of new build wastes remains as set out in para 25 of its 2006 Recommendations (see para 2 above). The process carried out by CoRWM in the period 2003-2006 **was** for existing and committed wastes. **The only aspects of new build wastes considered were their potential impact on the inventory for disposal and on the size of the geological disposal facility (GDF).**
9. **CoRWM is still of the view that there is a need for a process specifically designed to provide input to decisions on the methods to be used for the long-term management of**

new build wastes. The difference now (February 2010) is that such a process is underway. Like the new build assessment process (para 5), the process for deciding how to manage new build wastes is multi-stranded and, while some strands are already in progress, others are yet to come.

10. Consistent with the Government response to CoRWM's 2006 Recommendations (Defra et al, 2006), new build wastes are being considered during the Managing Radioactive Waste Safely (MRWS) programme to implement geological disposal (Defra et al, 2008). As part of the voluntarism and partnership approach, potential host communities for a GDF for existing and committed wastes will be consulted about the inventory for disposal. The communities' discussions with Government about the inventory will cover new build wastes, amongst other issues. Technical aspects of disposing of new build wastes in the same facility as existing and committed wastes will be explored by the NDA's Radioactive Waste Management Directorate (RWMD), as part of its work to implement geological disposal.
11. The management of new build wastes is being considered during the regulators' GDA process (HSE, 2009a, b). The Requesting Parties are required to demonstrate that there is a radioactive waste management strategy, that there are detailed proposals for the management of operational intermediate level wastes (ILW), and that there is a viable option for the management of spent fuel (CoRWM doc. 2747). There will be an EA consultation on its findings in May 2010; HSE will issue its final GDA reports in 2011.
12. Other future strands in the process of testing and validation of proposals for the management of new build wastes include:
 - site specific regulatory processes for new nuclear power stations (nuclear site licensing, environmental permitting, approval of security arrangements)
 - future stages of the MRWS GDF site selection process
 - future RWMD work on GDF design and safety assessment.
13. In many of these strands there will be stakeholder and public consultation. If other new facilities are required for the management of new build wastes (eg a regional or central store for spent fuel), these will also be the subject of consultation via planning and regulatory processes.

Future CoRWM Work on New Build Wastes

14. CoRWM's future work on new build wastes will consist of carrying out scrutiny of and providing advice on:
 - consideration of waste issues in the public assessment process for new build power stations
 - formulation of plans to ensure that, if new build wastes are created, they are safely and securely managed
 - prevention and, where that is not possible, minimisation of adverse impacts on the management of existing and committed wastes
 - gaining and maintaining public confidence in plans for the long-term management of new build wastes, in addition to existing and committed wastes.
15. CoRWM's response to the draft NPS consultation (CoRWM doc. 2748) is a first step in this work.

References

CoRWM Documents

CoRWM doc. 700. *CoRWM Recommendations to Government*. 2006.

CoRWM doc. 2747. *Meeting with the Regulators' GDA Team*. 8 December 2009.

CoRWM doc. 2748. *CoRWM Response to the DECC Consultation on the Draft National Policy Statement*. February 2010.

Other Documents

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DECC, 2009b. *Draft National Policy Statement for Nuclear Power Generation (EN-6)*. November 2009.

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HSE, 2009b. *Nuclear Directorate Generic Design Assessment – New Civil Reactor Build. Step 3 Radioactive Waste and Decommissioning Assessment of the EDF and AREVA UK EPR*. Division 6 Assessment Report No. AR 09/033-P. November 2009.