

**Update – Intermediate Level Waste Interim Storage**

**LEAD OFFICER:** David Davies, Head of Sustainability & Nuclear Policy  
**REPORT AUTHOR:** David Davies, Head of Sustainability & Nuclear Policy

**Recommendation: that (A) the Committee continues to lobby the Nuclear Decommissioning Authority for increased stakeholder engagement on the issue of Intermediate Level Waste storage and the decision making process, and**

**(B) a further report be submitted to the Committee once a consultation timetable for Intermediate Level Waste storage has been established.**

**BACKGROUND**

The Committee at its last meeting noted that the item in its work plan on community engagement – medium/long term nuclear storage was due to be reported to the committee later on in the year and agreed that an interim report be submitted to its next meeting including a timetable for the proposals.

The following report outlines the current status of Intermediate Level Waste (ILW) storage.

**What is the current approach?**

The current approach to interim storage of ILW is to build storage facilities at the sites where it is created. Some Magnox reactor sites - and, indeed, Dounreay, Harwell and Winfrith - are, or will be shortly, making significant investments in treating and storing ILW.

**What is the Nuclear Decommissioning Authority (NDA) doing?**

The issue for the UK as a whole is whether it makes sense to rationalize ILW interim storage at a smaller number of storage centres than currently planned, such as Sellafield, Dounreay (for its own waste) and perhaps one of the southern sites.

The NDA cannot take a fully informed decision on the best approach to ILW interim storage until the Government has decided on the long-term management arrangements for ILW (i.e. implementation plans for deep geological disposal) and until the implementation timetable is clear.

The NDA are conducting a national review of waste arisings and storage conditions, which will inform the basis of a 'forward stores' strategy. The evaluation includes:

1. Whether to have a local, regional or national interim storage solution, including storage at either;
  - Every site,
  - Dounreay, Sellafield and one of our Southern sites,
  - Dounreay and Sellafield, or
  - Sellafield alone as it currently stores 60 per cent of UK ILW in terms of its radioactivity.
2. Whether existing infrastructure could be used for a proportion of the required ILW interim storage rather than building new stores.
3. Whether to build interim stores on either a generic or bespoke design basis.

It is clear that the NDA does not want any of interim storage facilities to be considered as providing a 'long-term management solution' (i.e. several hundred years) since they are not being designed to fulfill such a function.

The criteria used to evaluate the options include:

- Safety, security and environmental considerations, which are paramount,
- Stakeholder views (regulators, local communities, NGOs etc); including the concepts of volunteerism, veto and compensation,
- Impact on site end states and end dates,
- Life cycle analysis i.e., the cost to build, maintain, operate and dismantle the storage facilities under each of the options,
- Transportation, security and logistics costs,
- The handling, conditioning and packaging options and costs,
- The form of waste arising,
- The volume and profile of conditioned ILW generated in compliance with the improved regulation of waste packaging,
- Socio-economic implications, and
- The application of an NDA prioritization process.

### **What is the Council doing?**

Firstly, the Council's concerns about the lack of involvement of local authority stakeholders in the review of ILW storage options have been fed into the NDA review of stakeholder engagement via the Local Government Association's special interest group NuLEAF.

The Council has at every occasion responded to Government, Site License operator and NDA consultations on the interim storage of ILW. Section 6 of the

Council's Nuclear Policies outlines the current stance on this and the wider issue of nuclear waste management. See Appendix A.

## **Conclusion**

Further to the delay caused by the wider DEFRA deep geological disposal consultation, the NDA are currently reviewing the whole ILW interim storage project with a view to rationalizing. This is due to new thinking on the potential benefits of waste minimization and optimization, the outcome being the need for less stores overall.

As a result there is no consultation timetable as yet.

The Council will continue to lobby the NDA for increased stakeholder engagement on the issue of ILW storage and the decision making process. The Council will seek to influence Government and NDA on the basis of our nuclear policies.

## **List of Appendices**

Appendix A – Long term management of radioactive waste

## **List of Background Documents:**

None

**6.0 LONG TERM MANAGEMENT OF RADIOACTIVE WASTE**

- 6.1 It is Council policy to seek a strategic and co-ordinated approach to dealing with waste nationally with the long term management of the lower level wastes being regionally or sub regionally based and the very highest level wastes being in centralised management facilities. The council fully endorses the use of the Waste Management Hierarchy which provides a framework for the efficient management of waste. In any siting process issues relating firstly to safety and secondly to environmental impact must be given priority.
- 6.2 Copeland Borough Council recognises that the UK Government will need to find one or more locations for such facilities. On the basis described in this policy the Borough Council would be prepared to enter into a dialogue with Government to explore whether there are circumstances under which the Copeland community and the government could enter into a partnership that agree formal arrangements for Copeland hosting a long term radioactive waste management facility.
- 6.3 The Council policy is to favour phased deep geological disposal of higher level wastes, which would be fully monitorable and retrievable, until such time that sufficient research is available on the facility operation to determine the appropriate backfill date.
- 6.4 With regard to Low Level Radioactive Waste in particular, the Council's position is to oppose any increase in capacity at the Low Level Waste Repository in Copeland until a community package is agreed with this Council.
- 6.5 Copeland Borough Council has maintained a consistent policy in recent years that additional LLW and ILW from outside this area should not be moved to Copeland unless a negotiated agreement, including a community offset package, can be agreed.
- 6.6 The Council will only support a proposal for disposal or long term storage of radioactive waste where it meets the requirements set out in Local Plan Policies I and 2.
- 6.7 Copeland would have serious concerns if West Cumbria were used as a centralised interim storage location for intermediate or higher level radioactive wastes. This would prejudice a future siting decision for a repository or other permanent facilities and concentrate perceived hazard and risk and associated stigma in our area to our further disadvantage. Increasing the amount of the UK's waste stored locally will increase the likelihood of a

disposal facility being in West Cumbria and reduce the attractiveness of alternative options.

- 6.8 The NDA's pricing structures should encourage waste minimisation and recycling wherever possible.
- 6.9 The Council believes that any process for siting long term radioactive waste management facilities or centralised interim facilities must rely on a partnership with willing host communities. This needs to include full consideration of community packages to offset detriment and make any such facility acceptable to the receiving community.
- 6.10 The Council believes that the process for siting long-term radioactive waste management facilities should involve clearly defined decision milestones that are integrated with evolving planning and regulatory processes, including requirements for sustainability appraisal and strategic environmental assessment.
- 6.11 During the course of a siting process it may be necessary to review, amend or develop Local Development Frameworks (LDFs) or Regional Spatial Strategies (RSSs). In order to clarify what is required of the developer in the siting process, the Government should issue a Planning Policy Statement specific to long-term radioactive waste management facilities.
- 6.12 The siting process must include a right of withdrawal on the part of participating communities. A decision to withdraw would be made by the relevant local authority, following engagement with local communities, and in the light of material evidence that set out the case for withdrawal.
- 6.13 The implementing body would respect the decision of the local authority to withdraw and would remove the affected area from the siting process. It is envisaged that the decision to participate and the right of withdrawal would be set out in a formal agreement between the implementing body and the relevant local authority.
- 6.14 This might take the form, for example, of a Memorandum of Agreement. This would specify the sort of conditions under which a right of withdrawal could be exercised (for example, if evidence became available that the proposed site was unlikely to be acceptable on environmental or safety grounds). The formal agreement should also identify the milestone beyond which a right of withdrawal would no longer be available. This might, for example, be when full planning permission is granted for the development of the facility.
- 6.15 The partnership agreement would need to reflect the value and scale of such a service to the nation.
- 6.16 The Council believes that for any such partnership agreement to be reached, the local community will need to be fully engaged in the issue and widely consulted before Copeland Borough Council makes a final decision.

- 6.17 Measures to offset the detriments created by the presence of hazardous radioactive wastes, and recognition of Copeland's strategic national importance in this respect, have been minimal. The Council does not accept the concept that it is equitable for Copeland to host waste generated in its own areas just because they have received economic benefits from previous nuclear operations. Nuclear facilities were installed to meet a national need and not a local need; the benefits have therefore been national whilst most of the detriment has been local.
- 6.18 Community offset packages need to recognise the length of the time period that the local community will be affected by potential detriments is unusually long and that packages to offset this must provide a positive impact for a similar length of time. A major element of any such offset package should be an intergenerational endowment fund that can be managed to the benefit of local people, by the local people, into the long-term future.
- 6.19 Copeland Council and the siting partnership should be fully funded by Government to involve the local community in a dialogue on these issues and it should not be the responsibility of the local Council or local Council Tax payers to fund the costs of this.