

**Submarine Dismantling Project (SDP) – Interim Intermediate Level Waste Storage Site Selection Consultation.**

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**Summary and Recommendation:**

The Military of Defence (MOD) are carrying out a consultation on the 5 possible sites where an interim storage facility will be created to store Intermediate Level Waste (ILW) from the submarine dismantling project, one of which is the Sellafield site.

The Council has reviewed the Strategic Environment Assessment and drafted a proposed response to the consultation.

**Recommendation:** That Members approve the draft consultation response to the current consultation.

**1. Background**

- 1.1** Members may recall that the MOD ran a consultation in October 2011 to Feb 2012 into the Submarine Dismantling Project (SDP). The first stage of SDP's decision-making addressed the questions of how and where the radioactive waste would be removed from the submarines. Copeland Borough Council responded to that consultation and highlighted the significance of the need to consult with the potential communities storing the ILW.
- 1.2** The MOD formally announced on 22 March 2013 that the following decisions had been made: 'initial submarine dismantling will take place in situ at both Devonport and Rosyth; Reactor Pressure Vessels (RPVs) will be removed and stored intact; and a revised approach to selecting an ILW storage site will be taken forward.'
- 1.3** In the previous consultation only the *type* of site was defined by ownership and its proximity to initial dismantling sites. This is now a further stage of analysis and public consultation, which has identified 5 potential sites:

Site	Owner	Site Licensee
Aldermaston (Berkshire)	MOD	AWE plc
Burghfield (Berkshire)	MOD	AWE plc
Chapelcross (Dumfriesshire)	NDA	Magnox
Sellafield (Cumbria)	NDA	Sellafield Ltd
Capenhurst (Cheshire)	Contractor – Capenhurst Nuclear Services	Capenhurst Nuclear Services1

## 2. Present Consultation

- 2.1** On the 13 February 2014 the MOD published a provisional shortlist of sites that may be suitable for the interim storage of Intermediate level Waste (ILW) that will be removed from ex-Royal Navy nuclear-powered submarines.
- 2.2** The MOD is now in the process of carrying out a public consultation. As part of this consultation process the MOD came to the Copeland offices on the 02<sup>nd</sup> December and give a presentation to Members on the proposals, they have also posted information leaflets to homes in the Copeland area.
- 2.3** This public consultation was launched in November and **closes on the 20<sup>th</sup> Feb 2015**, during this time public exhibitions were held at each of the shortlisted sites including 2 in the Cleator Moor Civic hall (17<sup>th</sup> Dec 2014 and 28<sup>th</sup> Jan 2015) and 2 in the Beacon Museum in Whitehaven (18<sup>th</sup> Dec 2014 and 27<sup>th</sup> Jan 2015).

## 3. The Impacts for Copeland.

- 3.1** The MOD have stated in the Strategic Environmental Assessment that the RPV store will have minimal socio-economic impact – either negative or positive – on the local community around the chosen site. They have also stated that they would not be offering any form of community benefits package.
- 3.2** No Significant impacts are anticipated in the SEA Environmental report on the number and types of local jobs available. Sellafield notes that there is already a massive construction programme at Sellafield being delivered through the supply chain, and additional local employment during construction would not be significant within the wider context.
- 3.3** Despite mitigation, construction and decommissioning traffic vibration and dust may affect historic structures. There would be cumulative effects from other infrastructure projects, including the proposed nuclear power station.
- 3.4** Future assessment may determine that additional flood risk measures are required for Sellafield, but this decision would not be affected by the presence of an RPV store.

#### **4. Way Forward**

- 4.1** The Council has drafted a proposed response to the consultation based on the future decommissioning of the Sellafield site, the future repackaging and disposal of the RPVs and the socio-economic implications.
- 4.2** Members are asked to consider and approve the draft response considering any amendments that may need incorporated.

## Appendix One: Consultation response to MOD on SDP Interim Storage Site Selection.



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Submarine Dismantling Project

Date: 03<sup>rd</sup> Feb 2015

Dear Sirs

### **CONSULTATION RESPONSE TO THE INTERIM STORAGE OF INTERMEDIATE LEVEL WASTE (ILW) STORAGE SELECTION ON THE SUBMARINE DISMANTLING PROJECT (SDP).**

The Council welcomes the opportunity to comment on the options for the proposed locations of an interim storage facility for Intermediate Level Waste (ILW) from the Submarine Dismantling Project (SDP).

The Council has carefully assessed the options currently tabled and the matter has been considered by the Council's Strategic Nuclear and Energy Board at a meeting held on 17<sup>th</sup> February 2015.

The Council has welcomed the robust consultation undertaken by the MOD which included extensive letter mailing and 4 workshop events in the Copeland area. The Council would urge that the MOD continues to demonstrate the adequacy and effectiveness of consultation through appraisal and weighting of concerns and opinions expressed.

The Council is satisfied that the proposed storage facility could be managed in a manner which would insure that the risk to the surrounding environment, of potential contamination, from the storage facility is minimal and that the Sellafield site as a competent nuclear waste management site operator could efficiently manage the risk. However, as stated within the strategic environmental assessment Sellafield has a "comprehensive suite of waste management facilities to treat and dispose of the waste arising from the commercial and decommissioning operations or reprocessing". Therefore the Council's concerns do not arise from Sellafield's capability to manage the interim storage of the ILW but the sites capacity to accommodate a large store on a site where there is a significant competing demand for space to accommodate development which is of far greater value to the Country's decommissioning and nuclear related development requirements and ambitions.

The Sellafield site is unique with specialised reprocessing and decommissioning skills and facilities along with a highly skilled workforce with many years' experience in dealing with High and Intermediate level wastes.

The proposed development would occupy a substantial amount of space on what is a premium nuclear licenced facility requiring very little skills or labour. The Council is concerned that the allocation of this land, to a storage facility, fails to effectively utilise those skills and brings little or no significant added value to the local community.

Development of a storage facility has the negative impact of inhibiting the overall decommissioning strategy of the site and the scope for the future development of the site as a centre of excellence for nuclear waste management and reprocessing. The potential for Sellafield to be a national / international leader in the nuclear waste management field is recognised by the Department for Energy and Climate Change and by the Department for Business Innovation and Skills.

The Council notes that within the design specification it states that there will be a 50% footprint contingency as it is assumed that the RPV transport/container will not be suitable for onward transport and repackaging of the RPVs will be required at the end of the interim storage. This aspect of future work and development has not been fully explained in the consultation process and is something that the Council would seek further clarity on.

The current proposed project offers little community benefit in the way of providing a need for specialised skills and creates very few jobs. The MOD has stated that they will not be offering any financial community benefit as part of the project. The development therefore provides no community benefits, and few socio-economic benefits with the potential for this building to occupy what is a scarce resource which could potentially be used for other more beneficial proposals.

Sellafield already hosts over 70% of the UK's nuclear waste and until a final site for long term storage is located the council does not support the storage of this waste here, in conclusion the development would not be in the best interest of the local community.

Yours Faithfully

Cllr Elaine Woodburn

Leader of the Council