NWG 01 09 06
Item: 8

PROPOSED STUDSVIK DEVELOPMENT - LILLYHALL

CHAIRMAN:	Cllr Geoff Blackwell
PORTFOLIO HOLDER:	Cllr Elaine Woodburn
LEAD OFFICER:	David Davies
REPORT AUTHOR:	Frank Duffy

Summary:

In June 2006 the Environmental Agency (EA) consulted both Copeland and Allerdale Councils in response to an application from Studvik UK Ltd, to accumulate and dispose of radioactive waste. On the 7th July the NWG considered the application and made comments which were forwarded on to the EA. Report to EA attached.

Subsequently, a meeting has been held between officers and the President of the company at which NWG's concerns were expressed. A report of the meeting is attached. There is an outstanding issue relating to the company's transport plans which the company will explain when it meets members of the Council in early September.

Recommendation:	Recommend that members consider the current update and be aware that an opportunity to meet and discuss further with the company will be available on Monday 4th September at 17:30 in the Council Offices.

Impact on delivering the Corporate Plan:	None
Impact on other statutory objectives (e.g. crime & disorder, LA21):	None
Financial and human resource implications:	None
Project & Risk Management:	None
Key Decision Status	
- Financial:	N/A

- Ward:	No
Other Ward Implications:	Though the business will trade out of premises in Allerdale, movement of material will take place within Copeland with waste going to the Low level Waste Repository.

1. INTRODUCTION

In June 2006 the Environmental Agency (EA) consulted Copeland Council on an application from Studsvik UK Ltd, a subsidiary of a Swedish parent, on the application for authorisation to accumulate and dispose of radioactive waste. The company wishes to set up a business on the Lillyhall Industrial Estate and transfer the unusable waste to the Low Level Waste Repository (LLWR) by road and rail. This is a dry process with over 90% of the received waste recycled.

Though the business will be situated in Allerdale, the residue waste will be transported within Copeland with some waste destined for the LLWR and because of this the EA felt it was right and proper to consult with Copeland Council. On the 7th July the Nuclear Working Group considered the application and raised a number of points and concerns which were passed on to the EA on the 14th July. Copy of response attached.

2. UPDATE

At the request of the President of Studsvik Ltd officers agreed to a meeting with the company on the 11th August. A PowerPoint presentation on the business and its processes was given and together with probing questions, officers are now satisfied that this is a safe process being carried out by a well established business which could have benefits for the local supply chain. The Swedish company was established some 20 years and employs 1400 people in 7 countries. Studsvik has a good record on community involvement and is happy to arrange visits/meetings.

If planning permission is given then the Lillyhall operation should be up and running by January 2007. A report of the meeting is attached.

3. Conclusion

Officials have been reassured by the answers from Studsvik to the concerns raised by the Council. The company will fully explain its plans when it gives its formal presentation to members of the Council on 4th September 2006.

Our ref: EA/consul/stuk/0706

14th July 2006

Dear Mr. Moloney

RSA 93 - STUDSVIK UK LIMITED – APPLICATION NUMBER CA5320 & CA5338

Thank you for giving Copeland Borough Council this opportunity to respond to your consultation on the application for authorisation to accumulate and dispose of radioactive waste. On the 7th July 2006 the Council Nuclear Working Group considered the application and would like to make the following comments on the authorisation and in general terms with regard to the location and operation of the proposed plant.

The Council is concerned over the limits quoted in Table 1 of the introductory document, which states a maximum volume to be accumulated at any one time as being 2000m^3 of Low Level Waste. The application (RSA1o) states that waste would be received by Iso-Frieight Container or Drum, bearing this in mind this would translate to approximately 10,000 standard 200-litre drums or over 100 standard ½ height iso-frieight Containers. This number of containers equates to about a third of the annual consignment of LLW to the LLWR near the village of Drigg. It is our opinion that this represents a large volume of accumulated waste for what is essentially a treatment facility. Furthermore the company has applied for authorisation to dispose of 100m^3 of LLW and 4.8 m^3 of VLLW per year, this would represent a significant work-stream unless there are high confidence level of decontamination to 'free-release' levels and thereto consigned to landfill.

Will all gaseous discharges be conducted in a controlled environment and sent via the one discharge point described in the application or will some treatment be done in the open air? We are concerned that standard surface decontamination techniques such as high-pressure water could produce aerosol type releases, which may cause localised contamination.

With reference to radioactive liquid discharges being discharged to the local sewer, what arrangements have been made for the long and short-term monitoring for highly mobile radioisotopes such as Te ^{99} and H^3 in the local environment, bearing in mind any uncertainties over sewer integrity. Again the Council asks the Environment Agency to consider this and report back what arrangements would be made.

The Council is concerned over where the treated waste will be consigned once decontaminated to levels below exemption i.e. free-released; will this be to local

municipal landfill? Is there any arrangements being sought for the recycling of metals? We have concerns over the suitability, due to perception of risk, of uses for prior radioactive contaminated metals and would ask for assurances that metals, for example would not go onto be used as items for containing food etc.

The type of work outlined in the application appears to be of a 'hands-on' type of work. The Council requests that all measures are taken to protect the workforce. We would ask that the regulators ensure the company's health and safety record be of the highest standard.

The area chosen for development is very close to other businesses outside the nuclear industry, has consideration been made with regard to Emergency Planning and the training of persons in those businesses of the procedure to follow in the event of an incident? The Council asks the Environment Agency to consider this and report back what arrangements would be made.

The application states that the applicant would receive waste for treatment from 'all nuclear sites' including British Nuclear Group, UKAEA, MOD, Rolls Royce and Amersham. Would the waste received be exclusive to the UK or would overseas waste, for example from Eastern Europe be considered? This implies that radioactive waste will be travelling by road across the length and breadth of the UK to West Cumbria. Has an alternative site been considered where the use of rail could be used rather than road? Furthermore we are concerned that radioactive waste would be travelling from the sites at Sellafield and Windscale by road through towns and villages and then further waste would be travelling back to the LLWR again by road. Has the company considered an alternative site closer to the area it intends to receive the majority of its waste from?

The Council is concerned over the security of the proposed site. The application states that security of the site will be carried out on a 24-hour basis. Would the security be performed by suitably qualified and trained staff such as those on the Sellafield, Windscale and LLWR sites? Would the staff be OCNS police or standard security guard?

Finally, we are concerned over the lack of safeguards in place for the receipt of waste into the site for treatment, especially when considering the types of material likely to be sent, i.e. concrete, metals etc. As you will already be aware materials such as these are 'self-shielding' in nature and causes issues relating to their accurate monitoring if sent bulk-containerised. Often the consigner is relied upon to assess and characterise the waste and only arbitrary checks are made at the treatment plant. Again the Council asks the Environment Agency to consider this and report back what arrangements would be made.

Yours sincerely

David Davies
Head of Sustainability & Nuclear Policy

MEETING NOTE

Meeting: 09.00 Friday 11th August 2006 at Westlakes
Venue: Westlakes Science & Technology Park

Re: Proposed Studsvik Development – Lillyhall

Attendees:

D. Davies	CBC
F. Duffy	CBC
D. Holden	WCDA
M. Lyons	STUDSVIK (CEO)

Concerns

- Studsvic representatives answered all of our main comments and concerns satisfactorily.
- The treatment site uses a grit-blasting type decontamination process, which is fully-contained, and aerial emissions fully controlled by HEPA filtration, i.e. 99.99%.
- Metals only, no other waste.
- Robust receipt and export monitoring using up to date Health Physics monitoring
- Security advice taken from Cumbria counter terrorism group and will be periodically checked by same.
- Being a dry-process; liquid radioactive discharges are extremely minimal and are limited to workers hand basins only.
- They recycle between 95 % and 97 % of the waste they treat, so there will be minimal return i.e. to LLWR. Usually only the grit used in the blasting process and PPE from the workers.
- It is a batch process, and will be characterised to form radio-isotopic fingerprints on site and the waste segregated to stop cross contamination etc.
- The site at Lillyhall will not be taking waste from non-nuclear sites, i.e universities, hospitals etc.
- The only sealed sources (favorites for terrorists) will be those used for their own instrument calibration. No sealed-sources waste.
- Why Lillyhall?
    - They wanted to be near a port for export to Sweden and national rail links for UK import.
    - LLWR at Drigg is possibly a short-term site 10-15 years only?
    - Problems of extra expense being on a nuclear licensed site.
- Transport to and forth okay
- Recycled waste will go to responsible after-market resale, Studsvik are in talksat the moment as to whom that will be.
- Waste that they cannot decontaminate to UK SoLA exemption levels (i.e. free release) will be exported via Workington Port to their metal smelter in Sweden, this waste will then remain in Sweden and sold to the recycled metals market.
- Waste amount to be stored will be no more than 400 [1] cubic metres at any one time, a lot less than the EA consultation of 2000 cubic meters suggested, as this is for the whole year.

Notes: [1] 400m3 is approximately 20 standard half height iso-freights or 4000 standard 100 litre black waste drums.

Benefits

- They predict up to a 20%reduction of waste going the LLWR, thus reduction of waste going to the site.
- Able to prolong the life volumetrically (however the radiological inventory will obviously stay the same).
- Shows a responsible attitude to the principles of sustainable development and the waste hierarchy.

Stakeholder & Community Relations

- Studsvik have a good record of community involvement in the USA and Sweden, and will be happy to organise meetings/visits etc.
- They have been talking to Allerdale about a small socio-economic package.

David Davies
Head of Sustainabilty and Nuclear Policy

Notes: [1] 400m3 is approximately 20 standard half height iso-freights or 4000 standard 100 litre black waste drums.