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13<sup>th</sup> September 2006

Dear Dr Simper

**Discussion on the Future of the Windscale Nuclear Licensed Site**

Copeland Borough Council was disappointed that the NDA had chosen not to consult us on this important local community issue. We would like to take this opportunity to remind the NDA that we are democratically elected to represent the community of Copeland and as such are clearly a key stakeholder in matters that affect our community.

The issue of the 'Future of the Windscale Nuclear Licensed Site' was considered by the Council's Nuclear Working Group on the 1<sup>st</sup> September 2006, which has the remit of considering all issues relating to the nuclear industry and advising the Council accordingly.

The Nuclear Working Group reached the following conclusions:

Firstly, the Council is concerned about the general process used to seek and evaluate views on this issue. Whilst recognising that this is not a formal consultation, we are concerned that the process does not have the openness and transparency that we have come to expect from NDA stakeholder engagement. As key stakeholders in the local community have been omitted, the results obtained from the process will not be of significant value as the community's voice was not truly represented. Furthermore the time allowed for a response is too short for quality meaningful contribution. The Council also considers the declared timescale for making a 'final decision' on this issue to be inadequate.

We are concerned that the information contained in your original letter was insufficient to generate discussion, and the rationale for examining the option of amalgamation was not clearly articulated. For instance there was no information on the criteria the NDA would use to judge options and there was insufficient information to address issues relating to alternative approaches, timescales or implementation. Furthermore there were important issues omitted relating to the potential amalgamation of the two sites such as potential socio-economic impacts and mechanisms for ensuring safety during any transition process.

The Council is concerned about the apparent inconsistency between proposals to amalgamate Windscale into Sellafield whilst separating out Calder Hall. The Council would appreciate an exploration this inconsistency and would like to be assured that the proposals under discussion have a full justification of cost versus benefit.

Your letter dated the 4<sup>th</sup> August asked for views on four specific issues these were:

1. The principle of amalgamating the Windscale and Sellafield sites.
2. Alternative approaches for achieving the benefits of integration.
3. The timing for any amalgamation.
4. How best to implement any amalgamation.

With regard to the above issues, the Council does not wish to dismiss the possibility of amalgamation between the nuclear licensed sites of Sellafield and Windscale. However, it is difficult to come to an informed opinion without sufficient information. Therefore we suggest that if the NDA decided to take forward any option other than the status quo we would like to suggest that the whole process be reviewed and readdressed for consultation in order for it to:

- Collate a representative response of the views of the local community
- Be less ambiguous
- Include an explanation of the drivers underpinning the NDA's reference proposal
- Allow the necessary time needed to undertake it
- Show greater clarity of the issues of concern that the NDA is seeking to resolve.

The Council agrees with the following risks identified by WCSSG and asks the NDA to address them to allay concerns:

- Possible destabilisation of existing relationships
- Impact on people and culture, and knock-on effects on safety
- Potential impact on ability to deliver the Windscale work scope
- Loss to the site of UKAEA's experience in decommissioning as a specialism
- Employee fears regarding pensions, terms and conditions etc
- Unquantifiable delays to present programmes during changeover period

Yours sincerely

**David Davies**  
Head of Sustainability & Nuclear Policy  
Copeland Borough Council