

Professor Gordon MacKerron
CORWM
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24th June 2005

My ref: FM/CAR

Dear Mr MacKerron

How should the UK manage radioactive waste?
2nd consultation document

Thank you for the opportunity to input our views at this stage of CORWM's process. The management of radioactive waste is the most significant long-term issue facing the Copeland community and our continued involvement in the process is essential and welcomed locally.

The consultation document has been considered by the Council's Nuclear Working Group which has the remit of considering all issues relating to radioactive waste and the nuclear industry and advising the Council accordingly.

I can advise that we are in general terms happy about the process and the conclusions reached at this stage. We believe the document was clear and easy to understand.

The Nuclear Working Group reached the following conclusions:

- i. We agree with the short-listed options identified and do not feel any of those shortlisted should be screened out. (Q1.1 consultation document)
- ii. We also do not feel any screened out options should be retained. (Q1.2 consultation document)
- iii. Whilst we are happy for all the non site specific options short-listed to be considered and consulted on widely at this stage, we would not be in support of variants under

long-term interim storage that included unprotected stores or centralised interim stores at Sellafield. (Q1.3 ii)

- iv. We believe the options assessment process is an acceptable attempt to inform the decision-making process in a transparent way. However, there needs to be a recognition of the shortcomings of such a process. In particular the outcome of the weighting process will need careful interpretation. The weightings placed on different criteria will vary substantially depending how individuals see the option impact on them. The obvious example is, people who would not expect the radioactive waste to be sited close to their area may put cost higher than other factors such as impact on local and regional economies/natural environment/safety etc. Those people believing they may have to live with such a facility may give a low weight to cost. It is likely the former will be in the majority and would, therefore, be happy to transfer 'cost' from national monetary cost, which affects everybody, to more localised costs in terms of employment, environmental and safety detriments affecting a few. To deal with this the process should seek weightings from the public that have a national view and from areas that feel they risk having to host a facility. This would provide a range of weights that could allow a basis for sensitivity testing the outcome of the MCA processes. (Q2.1)
- v. Generally we are happy that the criteria are comprehensive. We recognise that some will be more difficult than others to score until the option can be linked to siting. However, it is important that they are included in the process so they can be tested and incorporated at this stage if possible. We wondered if 'regulatory, legal and planning' ought to be included under implementability as the other criteria deal with the sorts of issues that are considered when decisions are made under these processes. Perhaps this may lead to double counting. Perhaps this criterion should just be technical implementability. (Q2.4 and 2.5)
- vi. In response to the ethical issues raised (2.6 in document):
 - a. The health and safety risk should be no greater than the level of risk already existing in the regional/locality if the facility was not there.
 - b. It is not fair that one or a small number of communities bear the burden of radioactive waste. There should be no 'victim' communities. The presence of radioactive waste needs to be agreed with the communities alongside other measures that would make it acceptable.
 - c. It is not important that waste is managed close to where it is currently located. What is most important is that it is managed in the safest way. If a safer facility can be provided away from the current location than that may be preferable. In view of the long term nature of the hazard, short term issues of transportation need to be set against the need for the safest management over the long-term. There is also an issue of social equity where communities that have carried the burden for the nation, shall be expected to keep bearing it.
 - d. & e. We do not believe future generations should have to bear the burden. We should move rapidly to provide a safe and acceptable solution. Future generations should have the option to improve on that solution by building in retrievability.
 - f. Cost should only come into play to help decide between options that are acceptable from a safety and environmental perspective and are acceptable nationally and in the localities directly affected.

- vii. A further question that needs to be asked when assessing options is “can they be delivered and made acceptable to host communities”? If they can’t then implementing the solution will be difficult. (Q2.7)
- viii. We are concerned about the impact on communities hosting such facilities. There should be no victim communities that have their plans and strategies for developing their areas undermined by having such a facility placed upon them. (Q4.1)
- ix. With regard to implementation CoRWM should advise government that:
- x.
 - a. Radioactive waste facilities should only be located in local areas with the community’s agreement. The community, therefore need to have a veto.
 - b. Government should work in a genuine partnership with affected areas. Inevitably this will lead to discussions on a package that would allow the aspirations of the community to be realised despite the presence of a radioactive waste facility. The Government should be prepared to support such a package and recognise such an approach is common practice throughout the world.
 - c. In agreeing arrangements with affected communities the Government should recognise the timescales involved and the intergenerational impacts on local communities. (Q4.2)
- xi. The Council is working with Nuleaf the Local Government Special Interest Group on nuclear issues with the intention of commissioning a study into how the mechanisms in x. above could be delivered. We believe it would be beneficial if CoRWM and others became partners in the development of this work and request that you consider this as soon as possible. (Q6.)

Yours sincerely

Fergus McMorrow
Corporate Director (Economic Prosperity & Sustainability)