

Consultation Response: “Nuclear Decommissioning Authority Draft Strategy”

To: Nuclear Decommissioning Authority

By: The Intergenerational Foundation

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The Intergenerational Foundation (www.if.org.uk) is an independent think tank researching fairness between generations. IF believes policy should be fair to all – the old, the young and those to come.

Introduction:

The Intergenerational Foundation (IF) welcomes the opportunity to comment on the Nuclear Decommissioning Authority’s Draft Strategy. IF’s position on nuclear energy is that it creates an unfair burden on the future generations of citizens who will inherit the huge financial and environmental liabilities which are attached to decommissioning nuclear sites. Therefore, IF believes that the present generation has a responsibility to pass on as few of these burdens as possible to our children and grandchildren, which would require two things to happen: 1) for the UK’s existing nuclear sites to be decommissioned as rapidly as safety considerations will allow, and 2) for the UK’s stockpile of nuclear waste to be stored in a manner which is genuinely sustainable over the long term. Bearing these principles in mind, IF would like to make the following comments in relation to the Draft Strategy:

1) IF opposes the strategy of interim decommissioning and “quiescence”

The Draft Strategy places a strong emphasis upon the use of interim decommissioning strategies and leaving nuclear facilities in a state of “quiescence” for managing the UK’s nuclear waste stockpile, which IF believes pass an unacceptable burden on to future generations.

As the Draft Strategy acknowledges, nuclear liabilities represent an extremely long-term commitment: the process of decommissioning the UK’s last remaining existing nuclear sites is not expected to be complete until the year 2125, and the Higher Activity Waste (HAW) will remain dangerously radioactive for thousands of years. Therefore, IF believes it is vital for the UK’s policy towards nuclear waste to be designed around minimising the level of financial and environmental liabilities which future generations are exposed to. Of particular concern to IF are the plans to place the UK’s fleet of Magnox reactors in a state of “quiescence” for decades, as this means that the bill for decommissioning them will be borne largely by future generations of citizens who will not have benefited from any of the energy these reactors produced during their working lifetimes.

The Draft Strategy itself acknowledges that the benefits of this approach have been overstated (p.27), where it says that *“Increasingly, international bodies such as the International Atomic Energy Agency (IAEA) and the Nuclear Energy Agency (NEA) hold the view that reactor dismantling should be carried out as soon as possible, and have questioned the high weighting given to cost calculations on a discounted cost basis”* and *“a preliminary high level cost model suggests that as the deferral time increases, the reduction in decommissioning costs (resulting from increased worker access) is largely offset by the increased cost of preparing for and managing quiescence.”*

A strategy which, in effect, amounts to mothballing these existing nuclear facilities transfers two sets of risks onto future generations. Firstly, it means they will ultimately have to pay the bill for full decommissioning, which the Draft Strategy estimates will cost in excess of £6.4 billion, and secondly, it exposes them to the risk that one of these sites could suffer a major accident or hostile attack while it is awaiting full decommissioning. Therefore, IF recommends that the Nuclear Decommissioning Authority should review the decommissioning timetables for all of the UK’s existing nuclear sites and should lobby government for the additional funds which would be required to fully decommission all of them within the fastest possible timeframe.

2) IF questions the feasibility of building a Geological Disposal Facility

It is stated repeatedly within the Draft Strategy that the Nuclear Decommissioning Authority’s main approach to dealing with HAW, in accordance with government policy, is to plan for its eventual entombment within a Geological Disposal Facility (GDF). However, although IF would support this policy in principle because of the scientific evidence that GDFs represent the safest long-term means of disposing of HAW, IF is extremely sceptical about the likelihood of one ever actually being delivered.

As the Department for Energy and Climate Change’s white paper on *Implementing Geological Disposal* stated in 2013, the government has been searching for a suitable site where a GDF could be located since 2008 without any tangible success. The white paper also contained a tacit acknowledged that, although the scientific evidence was in favour of using GDFs to dispose of HAW, none are currently active anywhere else in the world. Given that the decision over where to locate a GDF is likely to remain extremely controversial politically because of resistance from the general public, and the UK’s poor track record at delivering highly controversial infrastructure projects such as extra airport capacity in the South East of England, IF is sceptical that this strategy will ever actually be delivered. The Draft Strategy itself does not actually envision that nuclear material would begin being entombed in a GDF until 2075, so again the burden of dealing with the most dangerous part of the UK’s nuclear waste stockpile is being passed on far into the future. The creation of a GDF cannot be delayed indefinitely because, as the white paper emphasised, the interim storage facilities which are currently being used to handle HAW only have a working life of around 100 years, when the waste they contain will be dangerous for many times longer than that. Therefore, IF recommends that the Nuclear Decommissioning Authority should lobby government to accelerate the creation of a GDF, and it should also produce a fully-costed alternative long-term strategy for HAW disposal which could be used in the event that one never materializes.

Conclusion

If you would like to learn more about the work of the Intergenerational Foundation or would like to organise a meeting to discuss the points we raise further, please contact:

Liz Emerson, Co-Founder

Email: liz@if.org.uk Mobile: 07971 228823