

Nuclear Information Service

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██████████
Office for Nuclear Regulation
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23 April 2012

Dear ██████████

Atomic Weapons Establishment: Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR)

I am writing on behalf of Nuclear Information Service to raise matters concerning the hazard identification and risk evaluation (HIRE) for the Atomic Weapons Establishment which is conducted to ensure compliance with REPPIR. This matter was mentioned in ONR's Quarterly News report for January – March 2012, which states: "Technical assessment of AWE's HIRE reports is now complete. A determination of any necessary changes to the detailed emergency planning zone based on this assessment, consultation with the local community and other relevant factors is due in the near future."

Nuclear Information Service has engaged Large & Associates to advise us on the application of REPPIR at the Atomic Weapons Establishment. I have attached a copy of the report prepared for us by Large & Associates which raises a number of issues for ONR and AWE. These are as follows:

- The current detailed emergency planning zones for AWE Aldermaston and AWE Burghfield, with radii of 3 km and 1.5 km respectively, compare poorly with the much larger zones applied at the US Pantex nuclear weapons plant and the zone evacuated in the aftermath of the emergency at the Fukushima nuclear plant in Japan.
- As yet, there is no specific extendibility zone for either site as work is still underway to determine the respective extendibility distances.
- HIRE reports prepared in the past are vague and fail to identify the nature and severity of potential accident scenarios, and emergencies resulting from acts of terrorism at AWE appear not to have been taken into account in risk assessments because they are not considered to be reasonably foreseeable.

- Safety assessments provided by AWE in 2005 do not appear to have been examined by the then Nuclear Installations Inspectorate, and NII did not have the time available to undertake detailed assessments of such submissions in 2008.
- Regulation 5(2) of REPPiR requires HIRE assessments to be conducted every three years and the regulations make no provision for this timescale to be extended. As the last review was conducted in 2008, it appears that operations at AWE have been conducted outside the scope of REPPiR since the last three year period ended in 2011.

Nuclear Information Service is concerned that the process for establishing emergency planning zones at AWE is untransparent and appears arbitrary; that the size of the current zones is inadequate; and that NII has in the past been unable to give the HIRE assessment process an appropriate degree of scrutiny. I am therefore writing to request that ONR takes the following steps:

- As an interim measure until detailed government policy has been formulated, advise agencies with emergency planning responsibilities that the radius of the detailed emergency planning zones at AWE sites should be extended to not less than 20 km to correspond with the exclusion zone currently in force around the Fukushima site.
- Publish a detailed rationale for sizing of the AWE emergency planning zones and a summary of the accident scenarios considered.
- Publish a firm timetable for completion of the current REPPiR cycle and advise on what steps you will be taking to address immediately the current situation which appears to place AWE outside the legal requirements of REPPiR.

Please do not hesitate to contact me if you require further information, and I look forward to hearing from you in the near future.

Yours sincerely,

[signed on original]

Peter Burt
Nuclear Information Service