

Nuclear Information Service

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Long Term Plutonium Management: Pre-consultation discussion paper covering decision methodology and timetable for decision making

Comments from Nuclear Information Service

1. Nuclear Information Service (NIS) is a not-for-profit, independent information service which works to promote public awareness and debate on nuclear weapons and related safety and environmental issues (see <http://nuclearinfo.org> for more information). Our research work is supported by funding from the Joseph Rowntree Charitable Trust.
2. NIS commented on the government's first discussion paper on key factors relating to long term plutonium management and is grateful for the opportunity to comment on this second paper.

Options for plutonium management

3. We would like to reiterate our view, presented in our response to DECC's previous pre-consultation paper, on the long term options for plutonium management. In summary, we do not consider that reuse is a viable option which can address the long term issues relating to the UK's plutonium stocks. NIS would like to see plutonium removed beyond future use and treated as waste. We accept that there will be an need to store plutonium stocks securely in the interim period before it can be treated as waste, but do not consider indefinite storage to be a suitable option for long term plutonium management.

DECC Preliminary view

4. As stated in our response to the first DECC pre-consultation paper, NIS feels strongly that the government should not identify a lead or preferred option for future plutonium management in any forthcoming consultation.

We are puzzled by the logic which underpins the second pre-consultation paper, given that DECC acknowledges that none of the three credible options for long term plutonium management have been worked up in complete detail, yet then concludes that focussing efforts on a preliminary view of the most appropriate long term solutions will give the best prospects towards a final long-term solution. As the NDA's 'Credible Options' report presents a substantial list of future research which is still required, there would appear to be no objective

grounds at this stage for developing a preliminary view on the most suitable option, and NIS is sceptical of the government's motives in wishing to do this.

Presenting a preliminary view would give a strong impression that the government had already made up its mind on the issue, and would undermine subsequent consultation efforts because stakeholders would conclude that there would be little point in engaging in the consultation exercise. We would prefer to see a consultation process that leaves options open as far as possible. This type of open approach to consultation was taken by the first Committee on Radioactive Waste Management (CoRWM 1), which deliberately considered all possible options and was open to all views, and is widely considered to have developed a robust and credible set of findings. The approach adopted by CoRWM 1 was based around dialogue and aiming to explore and understand issues rather than narrowing consultation to a limited set of questions. This approach not only succeeded in developing a technical solution to the problems CoRWM 1 investigated, but was essential in building trust and confidence in the Committee's work and conclusions.

NIS considers that DECC should not be giving a preliminary view until further understanding has been developed of the case for and against each of the three potential options. Development of a view on the way forward should be led by the consultation process and stakeholder views, and not by political considerations or dogma.

We cannot emphasise too strongly the importance of a consultation process that leaves options open as far as possible and allows a fair and transparent process which takes account the views of a broad range of stakeholders. Failure to take such an approach is likely to result in a widely held view that the outcome of consultation has been manipulated, and thus lacks legitimacy. The nuclear industry has a sufficiently long history of botched consultation initiatives to be fully aware of the risks resulting from this.

Key factors in decision making

6. It is important that the methods used in making a decision are clear and transparent, so we support the principle of consultation on decision making criteria and methods.
7. As stated in our response to the previous pre-consultation paper, NIS considers that, from the list of key factors presented in that discussion paper, the following factors are the most important:
 - Safety and hazard.
 - Security and proliferation resistance.
 - Environmental impact, and social impact on local communities at any sites affected by the management option selected.
 - Feasibility and technical viability.
8. It will be important during the consultation and decision-making process for DECC to acknowledge areas where there is a lack of information or scientific and technical uncertainty. This will help stakeholders in understanding the issues involved and also add to the credibility of the consultation process.

9. NIS advocates an incremental, step by step approach to decision making with stakeholder dialogue at all stages. As advocated in the pre-consultation paper, irreversible choices should not be made at early stages and there should be scope for reconsidering options if the need arises.
10. The issue of who is involved in decision making is also important. Decisions made by the nuclear industry in the past on the basis of its own 'expert' technical opinion are widely seen, with the benefit of hindsight, to have been flawed and have led to a series of costly mistakes. Scientific and technical experts from within the industry are just one stakeholder group, and must take their place among the full range of interest groups from across society, including lay members of the public and young people - representatives of the next generation who will have to live with the consequences of our decisions.
11. We should be grateful if DECC would keep us informed during future steps in development of the plutonium management strategy.

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