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Matter

Property

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Mr Bruce McKirdy
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Dear Bruce,

SKB Review of Version 5 of the Proposed Framework for Stage 4 of the MRWS Site Selection Process.

Thank you for the latest version of your siting paper which we received on 12 May. We have reviewed your paper and believe that this version has improved considerably from earlier versions and that you have considered and responded to our views in a very constructive manner.

The SKB siting process focussed on three key factors:

- Safety – the selected site(s) must have potential for a robust safety case, however it was recognized that as site data is limited at the early stages of the process there is not enough data to compare sites on safety.
- Society – willingness of the local community and other societal aspects.
- Impact on the environment/industrial aspects – this includes aspects such as infrastructure, environmental impact and transport links.

We believe that the proposed process and approach is based around these criteria. We are pleased to see that a central feature of the overall siting process is voluntarism. Recognising the right of a community to withdraw and a process based on community support is a sound principle which is essential for the success of the process.

On the issue of safety we note from our own experience that at the early stage of a siting process there is limited site specific data. Only when site investigation work at candidate sites has been completed can there be a discussion on long-term safety of the site(s). We therefore support the approach of using the principles provided by regulators and international organisations to screen sites at this early stage.

We recognise the remaining objectives as relevant to the factor of assessing the impact on the environment. The fact that these objectives have been the subject of consultation provides for a transparent and sound siting process.

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SKB's experience and approach in Sweden was to avoid a siting process based upon scoring and weighting of criteria. This was because such a system can turn the process in the wrong direction as there is a legitimate need for flexibility to allow the process to be adapted in light of developments and emerging data. We are impressed with the approach of NDA-RWMD in developing the process in consultation with a range of specialist both from a practical and theoretical background. We are also keen to point out that the siting process and approach for each country will depend upon past experience, the social context and the political environment. We therefore believe that the NDA and the UK Government are best placed to decide upon the approach appropriate for the UK. However, having decided to use a numerical decision making process we agree with the principle of keeping it simple. It is essential that the application of the process and the results can be easily communicated and understood by all the stakeholders throughout the process.

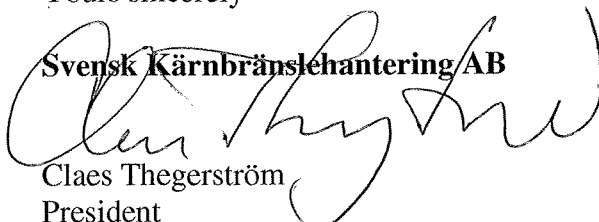
We suggested that the paper should clearly describe the steps and roles of the stakeholders who will be involved in the debate and the information to be issued and required at each step. We see some reference to this in this version of the paper but feel that this could be enhanced to improve understanding for the stakeholder audience. It may be that the best place for addressing this is in the consultation document from the Government.

Our only final comment and suggestion is of a somewhat detailed nature and concerns Figure 1. We believe this figure will be used as a "stand alone figure" in many presentations, both by NDA and by other stakeholders. Care should therefore be taken so that possible misunderstandings are avoided when this figure is taken out of its context. For example, use of abbreviations.

In summary we are very pleased to have been asked to assist the NDA-RWMD in the development of a siting process for a geological repository in the UK. Based on our experience of developing and implementing a siting process in Sweden the current proposal is much improved from earlier versions and provides a sound basis for a successful siting process.

It just remains for us to wish the UK every success with the further development and wide ranging consultation that will be undertaken on these proposals. We continue to follow progress in the UK with great interest and if we can assist with the successful management of this process and its implementation in support of a geological repository in the UK then please contact us. We are, as always, extremely happy to discuss and share our experience.

Yours sincerely

Svensk Kärnbränslehantering AB

Claes Thegerström
President