

NDA UK Radioactive Waste Storage Review Stakeholder Workshop

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The Convenor is a partnership
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Document Details:

This report is predominantly a transcript of discussions that were captured by live flipchart recording during the meeting in view of the participants. Note that the record is meant as an aide-memoire for participants rather than a definitive record of detail. We have added notes in boxed italics to explain what was happening during each stage of the meeting.

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The Convenor

The Convenor is an independent third party that engages stakeholders in the NDA's business of cleaning up the nuclear legacy. The Convenor is a partnership between two organisations:



3KQ focuses on consultation, dialogue and conflict management, having particular strengths in designing, organising and facilitating meetings and workshops



Dialogue by Design focuses on using new technologies to engage stakeholders, for example via consultation over the internet

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1. Executive Summary

This workshop was organised by the Convenor for NDA Stakeholder Engagement on 28 October 2008. It aimed to update stakeholders on the NDA UK Radioactive Waste Storage Review and solicit stakeholder views on the review report. The review covered waste types, arrangements and siting, packaging and timescales of interim storage, among other issues. The workshop considered each chapter of the draft review document in turn. Each chapter was first discussed by participants at tables of about six people. The focus of discussion at each table was the agreement of a short list of key comments on the chapter in question. These were noted on key comments sheets at each table. A selection of these comments were then shared and discussed in plenary before moving on to the next chapter.

A record of both the plenary discussion for each chapter and of the full list of key comments from all the tables is set out below in the following report. Readers are invited to refer to the sections for each chapter set out below to review these comments and discussions.

More broadly, the workshop agreed a proposed updated structure for the review document, as follows: -

- o Chapter 1 - Address CoRWM Recommendation 2
- o Chapter 2 - Address storage optimisation (NDA storage 2006 strategy)
- o Chapter 3 – Issues arising from chapters 1 and 2
- o Chapter 4 - Way forward, addressing the issues, and links into NDA high level Strategy

Stakeholders suggested that proceeding in this way will enable the NDA review document to be re-focussed as a review of the *current* storage situation, as well as dealing directly with the issue of storage optimisation. It was suggested that the current set of conclusions and recommendations in the review document should be worked on separately by the NDA as part of their wider strategy. This separation would have the advantage of enabling the NDA to consider the forthcoming CoRWM report on interim storage (due March 2009) in the context of its forward strategy. In turn this would also enable the sponsors of both CoRWM and the NDA to consider the alignment of these two pieces of work.

An independent evaluation report of the workshop will shortly be published on the NDA website.

2. Aim, Purposes, Agenda

Purposes

1. For stakeholders to consider and get clarification on the key findings of the draft NDA UK Radioactive Waste Storage Review
2. For NDA to get feedback from stakeholders on the NDA review
3. For stakeholders to give input on NDA's future work on interim waste storage

Ground rules for this workshop

- Contribute your thinking
- Focus on what matters
- One person speaks at a time
- Keep it short and simple
- If you don't know an acronym, put your hand up
- Mobiles off or on silent

Outline Agenda

08.30	Arrivals, signing in, refreshments
09.00	Welcome from Graham Jonsson - NDA
09.10	Reviewing key findings of NDA review document chapter by chapter at tables with short introduction to each by NDA: Chapter 1 Chapter 2
10.30	Coffee
	Chapter 3 Chapter 4 part 1 (Conclusions)
12.30	LUNCH
	Chapter 4 part 2 (Recommendations)
	Next steps for NDA, Way forward
4.00	CLOSE

Initial questions / comments from the participants

- It was suggested that the draft document should be made available more widely to allow greater transparency and to allow those not able to be here to contribute
- There was concern that the current draft review document sets out the ideal. But lack of funds and resources could impact on NDA's ability to carry out actions. It is necessary to ensure that this state of affairs is clearly communicated and acknowledged

The Agenda and ground rule reminders were agreed before proceeding. Workshop participants were seated around small tables in mixed groups of about 6 at each table. Each chapter of the draft review was briefly introduced by NDA and this introduction was followed by discussion at tables focussing on the agreement of key feedback points. These were recorded at each table on Key Comments sheets. Each table-top discussion was followed by a plenary feedback session during which each table in turn fed back their top one or two key points. As necessary these points were discussed and clarified in plenary.

3. Participants' comments on NDA Draft Review document, chapter by chapter

Chapter 1 – “Background”

Plenary feedback and discussion on Chapter 1

- Prompt immobilisation may not be possible for all wastes, so in this regard the draft review is idealistic. It needs to recognise this. This applies to all sites
- There needs to be greater clarity on whether the focus of the review is on stores or more broadly on storage systems and facilities. The view of the workshop was that it should be on the latter. The original CoRWM discussions were on buildings – i.e. stores – but things have changed, and we are now concerned with storage systems
- Currently Chapter 1 does not recognise the innovations that may become available
- The 100 year timeframe has yet to be confirmed – it should be at least 100 years
- Why is the estimated date for the completion of the repository 2040? This needs clarification. Is it purely a planning timeframe?
- Achieving sustainability of a store for 100 years is very difficult
- What is required is ‘Fit for purpose storage’, based upon what is needed in each case for the specific waste in question
- The Scottish Government is developing its policy – it is looking at opening up options and not closing down options
- The draft review document does not cover all types of waste storage e.g. raw waste. It does not cover unconditioned waste storage (at Sellafield and Dounreay) – see Chapter 2. Less than 10% nationally of the ILW has so far been packaged. This needs to be made clear within the review document. The reason for this is that the focus of the review is CoRWM Recommendation 2
- The Government’s position is set out in the bullets on page 8
- The review may have to comment on security and passivity as well as on the life times of the stores
- Page 12 – the section on “Reactor Decommissioning” needs greater clarity
- The message as to the extent of the legacy waste – and the financial resources required to deal with it – needs to be very clear in the review document and in communications to government and others in order to make the case for additional funding. Use visuals – e.g. Page 11, figure 2 – to help with this
- The review document should emphasise the areas where action needs to be prioritised due to limits of funding and resources

Record of all the key comments on Chapter 1 noted at tables

- Is the planning assumption of 2040 correct?
- The draft review does not adequately cover all waste storage - it is more a response to CoRWM's Recommendation 2 than a comprehensive review. There is very little information on raw waste storage
- The draft review is about the right length but it could include more references
- We need clarity about whether the review should simply focus on existing 'stores' or whether it should in fact consider 'storage systems' and facilities more broadly
- Chapter 1 does not acknowledge the potential innovations that could be applied to storage e.g. alternative packaging for wastes
- There are risks if we are not clear about the scope for waste optimisation and the decision making processes to achieve it
- It is necessary to locate the policy/ approach within the general principles of waste management practice e.g. sustainability
- We need to allow for decay storage in line with European policy
- We need to link to the NDA R&D programme
- We need a more graded approach to hazard categorisation and budget prioritisation
- The definition of higher activity wastes needs to be aligned with regulatory definitions
- There should be a recognition that spent fuel and plutonium may need to be considered in the future
- Although the Scottish Government position is clear, the Welsh position needs to be clarified – The Welsh Assembly has reserved its position
- The draft review quotes the guideline CoRWM figure of 100 years but slightly out of context. 100 years is mentioned frequently, but this timeframe has yet to be confirmed – it should be at least 100 years but with a further contingency
- In describing 100 year timeframe, the draft review does not correctly interpret CoRWM's remit
- Why is the GDF (geological disposal facility) date 2040? Is this budget led or is it a purely planning assumption?
- Storage could be more than 100 years if GDF is open into next century
- Don't build expensive stores where could build more cost-effective stores which are more readily maintained
- Less than 10% of ILW is currently packaged in form for disposal – remainder is still in historical legacy facilities
- The main risks are with the storage of current raw ILW. There has been slow progress to date with the conditioning of raw waste, which is a major project
- Identify where the waste is stored now and put this in context
 - Historical raw waste storage (90%)

- Conditioned waste storage (10%)
- Believe that CoRWM Recommendation 2 predominantly focuses on conditioned waste storage
- Prompt immobilisation may not be possible for all wastes; therefore report is idealistic, and this should be recognised
- We can't condition the waste until we know what we have – i.e. until the waste has been fully characterised
- Reactor decommissioning – need to be clear about what is removed from site – see paragraph 2, page 12. The great majority of radioactive waste is still on site - 99% has not yet been removed. It is in stores. It is primarily the fuel that has been removed
- Passivity may not be achievable in one step - improvement to safety of some wastes may have to be step-wise progression

Chapter 2 – “Findings”

Plenary feedback and discussion on Chapter 2

- Some of the information in the tables [from 2007] is already out of date. Depends on funding for capital expenditure
- Need clarity on 2007 status of conditioned and unconditioned waste to put everything into context
 - Suggest signpost in this chapter as to where can get more information from
- The review document does not mention existing stores that are unsuitable
 - Need to be clear when stores which are suitable but could become contaminated due to the degradation of their contents
- Use of language ‘localised surface features’ – needs to be more explicit but without being alarmist
- The review findings focus on civil structures, not on storage systems
- Recognise need for baseline, but concerned about lack of clarity for updating and monitoring
- The review document needs more information on the different waste streams and the specific challenges they pose
 - Should this be in this document or life time plans (LTPs)?
 - Don’t want to repeat work that has been done, but need to give selective examples and links/references to further information
 - Across the sites and waste types
 - There is already a public document on the website which could usefully be used for this
- State up front for each site what the intended process for dealing with the waste is
- Stress in the introduction that the approach is based on 2007 LTP but is open to innovation
- Chapter 2 is too complicated for the non-specialist reader, and should be simplified (e.g. move the tables to an annex at the end)
- Chapter 2 is not really a set of findings – it should be re-titled ‘Current Status’
 - Split into:
 - Overview of current storage systems
 - Overview of 2007 baselines
 - Tell the story which leads to the analysis
- The Scottish Government position is not fully recognised in Chapter 2 and this means that it is sometimes contradictory
- NDA needs to be clear about who this report is aimed at and why it was written

Record of all the Key Comments on Chapter 2 noted at tables

- Recognise there must be a baseline for review (LTP 07) but that this should be subject to:
 - Further verification of key data e.g. potential for lifetime extension of stores
 - A clear process for monitoring and updating to inform further work
- The potential role of innovation is mentioned in passing, but not addressed in detail. It could be inserted as an additional chapter
- NDA's Business Plan changes and funding availability are continuing to alter the planned dates in the tables. Some information is already out of date
- Much of the stated information in the tables depends on the availability of funding for substantial capital expenditure
- In the section on "Historical Waste Storage Facilities", there is a need for more information on the waste, the hazard the waste presents, and the associated technical challenges. There are different technical challenges across the various waste streams
- The difficulties involved in construction of new storage facilities – in particular obtaining planning permission – need to be brought out. This is an important risk, as it depends on individual planning decisions by local authorities
- Magnox sites – Calder Hall has been omitted
- The chapter lacks detail and it is not clear about scale of Sellafield store replacement needs etc.
- What is 100 year design life – is it the building only, or does it encompass mechanical elements too (e.g. crane rails etc.)?
 - Potential impact / limit on store design
- The potential limiting design features (vault vs. charge) have not been included
- Does the inspection regime also drive facility design / limiting factors?
- The review document should emphasise the waste that is in raw form – i.e. not just the conditioned product. Maybe needs a scene setting opening which states it excludes legacy ponds etc
- Conditioned waste as at 1/4/07 (2007 National Inventory)
 - At each facility
 - Currently conditioned
 - Stored conditioned
 - Stored unconditioned
- Sellafield – VPS (Vitrified Product Store): the table states that an extension of lifetime is not possible – but then the text later states that lifetime may be extendable
- Key Performance Indicators don't add value to the report – they only serve to highlight where NDA knows of existing issues / concerns
- Data is provided only for existing and planned waste stores based on current LTP planning assumptions – again, narrow scope

- Site-centric information – there is limited discussion in the draft review about storage rationalisation
- Recognition that the chapter provides a “snapshot” of the longevity of the existing and planned stores on each site – i.e. limited scope – more related to civil engineering issues
- The review document currently lacks information about the volumes and types of waste going into each store
- What is missing is information about the conditioned / unconditioned volumes of ILW at each site – could have a “signpost” to where this information is in NDA reports
- Page 22: Commencement of installation works for ILW retrieval facilities at Hunterston A. Which project?
- RSRL stores life extension study: only extended to a quick look by one person. A proper review is needed (not in baseline)
- Findings concentrate on stores, not the wastes contained (raw) or (passivated). So some existing stores e.g. B30, B38, are not included. Also not all current PCM stores included
- A “wiring” diagram for each site/SLC would be useful
 - Timeline
- Findings focus on civil structures rather than on the storage system(s)
- Suggest change the title of Chapter 2 to “Current Status”
 - Perhaps current content (data) should be in Appendix to avoid confusing the message to the reader
 - The current status of each store, including how full it currently is or the date when it is expected to be full, should be included
- Suggest split chapter into two (2A, 2B)
 - 2A Current overview of storage systems
 - 2B Overview of 2007 baseline

Chapter 3 - "Analysis"

Plenary feedback and discussion on Chapter 3

- The title of this chapter is 'Analysis', but it is really a statement of fact – consider amending the chapter title accordingly
- Planning constraints needs more information and analysis
- Need transport regulations that allow movement of waste in suitable form – not sure that this is fully covered at the moment. Need to look at the conditioning of the packaging of the waste, the transport mode, and the ultimate disposal of the waste
- The assumption is made that it will be necessary to treat all waste - but may want to keep the options open
- Need to be clear what have to do to achieve passivity, and the timescales required to enable this to happen (whilst avoiding double handling)
- It would be useful to have a description of ideal process or good practice to use as benchmark for the analysis – highlight where difficult to achieve in certain situations and the issues this raises
- All waste has to be transportable or you are closing down future options (will have to remain on site)
- The information is there in SLC LoCs, but in different building blocks
- Radioactive waste management case is part of the analysis
 - it is part of the joint guidance from the regulators
- Consider putting some of Appendix 2 into the main body of the report
- Some situations will become a strategic priority due to high hazard / high risk; and this may override best practice – need to acknowledge this in the review document
- Need clarity on what design life means in relation to the management of radioactive waste for 100 years
- The analysis in this chapter does not make links between the arguments and the evidence base. No references / transparency / or qualifications
- Need greater transparency about how stores are made secure in order to get greater public confidence
- There is no explanation as to why different packages are used in different locations
- This would be a good place to expand on storage optimisation
- Re. security – there is other legislation that goes with this which inhibits transparency of information. Needs recognising, and perhaps NDA should convene discussions on this, including NGOs, regulators, and representatives of the public
- Some stakeholders would like to see more public debate – transport security would be an aspect of this
- This document will become public
- OCNS have produced a document on what information can be released – could be a starting point for this discussion?

- Similarly the USNRC is carrying out consultation on how it can increase public access to security information without compromising security requirements – it would be good to refer to this
- This is an outside of the scope of this report, but NDA needs to acknowledge and take onboard comments

Record of all the Key Comments on Chapter 3 noted at tables

- Tables in report – no proper design analysis on lifetime extension – gut feeling used rather than systematic basis for lifetime judgement between sites
- What are the inputs? – no traceability; cannot audit process. Links to the Appendices are needed
- Planning for 50+ years – what if new technology emerges?
- Lack of specifics in Chapter 3 – vague – cannot identify any useful detail
- Assumption of GDF at 2040 – what if this does not happen?
- Monitoring and inspection arrangements are key – need to identify and budget for these
- Need industry-wide code of practice to set out what we're aiming for
- The analysis too generalised – no links or reference to supporting arguments/information for those who wish to know the detail (e.g. Appendices)
- Need to focus on the content of the stores i.e. the packages!
- Asset Care and Asset Management – the life-limiting features need to be addressed
- It would be very useful if this chapter identified the key issues raised through the review
- Page 32 – MoD wastes – clarification needed on waste disposal route for MoD wastes. [Assumption prior to government policy??]
- Local and national strategy may differ during planning process of stores
- Page 29 – Different packages are used at different locations. Does this make assumptions about the location of the final disposal site?
- Leak and escape from existing facilities and containment can be 'the sacrifice on the altar' of achieving the means of prompt passivation for some situations
- This chapter is not in fact an analysis – it only presents facts and establishes an issue
- The analysis doesn't convey the significance of the stores issue
- Storage is the protection of an asset, this needs to be stored
- This section only provides a snapshot in response to CoRWM Recommendation 2
- This document makes reference to policy intentions, is this pre-judging?
- Need transport regulations that will allow ultimate movement of waste in a suitably conditioned form

- Need more transparency about how stores are made secure. Not necessarily all the detail, but something that will provide greater reassurance to the public
- Security may improve as waste is conditioned
- Should some of this be discussed up front in talking about the concept of “storage systems”?
- Need a publicly readable document but with a bit more analytical detail to justify the statements made. Where is foregoing evidence to justify the statements?
- Chapter 3 is a re-statement rather than an analysis
- Is there a more effective format for the analysis? For example: an analysis to establish the quantitative benefits of the different strategies available would be good
- It would be good to separate statements from conclusions, and to create action points
- Is transport the key challenge? Very little content on planning constraints
- The review document should look at maintenance and decontamination issues of submarine waste
- Need more focus on full-life management
- Action!
- Planning constraints – risk management – requires better engagement
- Potential for optimisation of storage by using fewer sites. Raises planning challenges
- Is this an issue to raise public awareness and debate on? Tendency of industry to avoid the issue as it is sometimes politically difficult
- Need clarity of what design life means when compared with what the requirements are for managing radioactive waste for periods up to and beyond 100 years e.g. monitoring, obsolescence
- Risks associated with the impact of planning permission on future intents is not brought out
- Transport in relation to storage is important especially if consolidation is to remain an option
- Greater clarity around the issues of letters of compliance and expectations of package longevity is needed

Chapter 4: Part 1 – Conclusions (pp.34-37)

Plenary feedback and discussion on Chapter 4, Part 1 – Conclusions

- Need to check that the review document's conclusions are fully underpinned in previous parts of the report (including comments from earlier today)
- Need to check use of 'stores' / 'storage' in light of today's discussion
- Need task force to share experiences of stores / storage
- Need more specifics / clarifications on expectations of sites (e.g. p.36) re. demonstrating any extensions to the life of stores – what timescales and funding will be given?
- The review document is based on existing LTPs, but need greater recognition of Scottish policy – may need separate conclusions
- Contingency – there are assumptions that these timelines will be met – may need reality check and consideration of contingencies if timelines not met. NDA needs to develop contingent strategies in this review document as it does in other aspects in waste (Strategy Management System) both on a UK-wide basis and at the level of individual sites
- Need to answer CoRWM's recommendations and then look forward – but should the latter be in this document?
- If a separate document, then need to move to next steps rather than make piecemeal conclusions and recommendations. Currently Chapter 4 is lacks a strategic approach
- Constant dilemma – when should you involve stakeholders when developing strategy?
- Further links / sharing of information between sites is possible
- Waste hierarchy should be stressed move

Record of all the Key Comments on Chapter 4, Part 1 - Conclusions noted at tables

- Conclusions and recommendations need to be re-addressed on the basis of the comments already raised in the previous chapters including the extent of work that this will entail – e.g. demonstration
- Climate change, man-made interventions, store location and transport are not adequately considered in the report
- The review document does not address the policy position in Scotland. Accepted that the report is based on existing LTPs, but this is such a big issue it should be emphasised
 - Implication of above is that stores (in Scotland) should be designed to be refurbished more easily, wastes available for being moved etc.
 - The statement at foot of p.34 not supported by the Scottish Government

- The scope of the review document (and its conclusions) are focussed on barrier 4, whereas stakeholders are interested in the system as a whole – i.e. all barriers, and barriers 1 and 2 in particular
- Need a task force from all sites to discuss experience and see where standardisation can be obtained

- Waste type



- How has this been dealt with?



- What worked and what didn't work?



E.g. -

- Vent system
- Cranes
- store shape
- store type – above / below ground
- package type
- how original package produced – can this be reused?
- inspection
- maintenance
- transport

- Recommendations

- Decision timeline
- Principle passive store vs. managed technical stores. If 500 years – managed store needed
- Missing strategic approach to storage
- Reference storage strategy contingency e.g. As with NDA SMS (Strategy Management system)
 - Reference strategy – disposal
 - But also contingency strategy(ies)Don't start in the middle
- Implement alternative strategy 500 year packaging
- Need to retrieve 'historical' wastes promptly
- Would benefit from recommending further work on sharing of storage capabilities (on A & B sites for example) across SLCs
- Need conclusions on how new build programme may impact on store build programme

- General note of confusion that different terms are used to describe what 'may' be the same thing e.g. passivation, conditioning, immobilisation
 - Glossary and consistency required
 - Note EA / HSE / SEPA guidance
- What are the actions for NDA? Need to be clear on these and how they link to actions on waste producers and site operators
- Conclusions need substantiation and report needs the golden thread audit trail
- Uncertainties over package longevity and emerging findings should be fed into strategy
- Waste hierarchy should be considered and innovation encouraged. Store / disposal is last resort
- Needs to address the CoRWM / Government recommendations and be visible / give status / and put in public and therefore conclude this issue
 - BUT: need to move forward and then the structure may change to a "waste management process"
- Should add specific statements of whether the conclusion section does / does not satisfy the CoRWM recommendation
- Should add what extra concerns remain or further work is needed
- NDA needs to check that the review document's conclusions are fully underpinned by previous sections and data from SLCs, and make a statement to that effect and address the CoRWM recommendations
- Reflect on today's discussion of 'stores and storage' and possibly modify / add to conclusions e.g. New interim stores, page 36
- How are the actions to be taken forward by NDA, SLCs etc? Need to outline the process. Perhaps a 'code of practice'. Advice needs consolidation without a 'one size fits all'
- New design of stores should learn from experience at Sellafield and allow for re-packaging of wastes e.g. 'where inspection identifies integrity issues'
- 'Guidance' should be fit for purpose and graded to hazard etc.

Chapter 4: Part 2 – Recommendations (pp.37-39)

Plenary feedback and discussion on Chapter 4, Part 2 – Recommendations

- Suggestion that this review document should be re-focussed as a review of the current situation – i.e. remove conclusions and recommendations, and work separately on strategy
- NB CoRWM report on interim storage due March 2009. Suggest coordinate CoRWM and NDA timelines and messages to avoid confusion –
 - alignment of the two pieces of work needs to be considered by sponsors of CoRWM and NDA
- Recommendations are made to Government
 - Is this the only audience for the report?
 - Answer: this report is from NDA to Government
- Questions as to structure of review etc.
- Question asked: – will the stores last 100 years or not?
 - Now need to look at strategic options for storage
 - But the review document needs to address CoRWM's 5 questions as well, and the commitment to hazard and risk reduction optimisation from 2006 strategy (NDA)
 - This will then inform the higher strategy
 - SUMMARY
 - stores not storage
 - optimisation commitment (NDA Strategy)
 - CoRWM's recommendations
 - LTP 2007 is the basis for all of this work
 - work to underpin a strategy has not been done
 - NDA was asked to do review as per paragraph 1 of the Executive Summary
 - work has recognised, in addition, that changes have occurred which means that more work required to move forward
 - Optimisation – some stakeholders don't feel this is covered sufficiently in the review, and that it needs further and wider consultation
 - The review can only be a snapshot in time
 - Proposed structure for the review document:

1. Statement of where we are



2. Obstacles and barriers need identifying and working out how to overcome

3. Where we want to get to

Points 1. and most of 3. above are covered by the review document, but 2. is lacking - e.g. 100 years assumption

- The assumption of at least 100 years comes from how long it is estimated it will take to build and move waste in
- We should not be seeking to extend this piece of work in its current format. Need to answer questions NDA was asked so that the answers can feed into government policy-making

On the basis of this input in plenary, the participants agreed to allow a self-selecting working group of participants to work on a proposed updated structure for the review document, with the agreement that the workshop as a whole would then have an opportunity to comment on the updated proposal

The working group agreed an updated structure for the review document and it was then introduced to the whole workshop.

Proposed updated structure for the review document:

- Chapter 1 - Answer question on CoRWM recommendation
- Chapter 2 - Answer question on storage optimisation (NDA storage 2006 strategy)
- Chapter 3 - Issues that have come about while answering above questions
- Chapter 4 - Way forward to deal with these issues and link into NDA high level Strategy
(Remove recommendations to Government)

The participants agreed to consider the proposed updated structure at their tables with the help of members of the discussion group, and the following questions and clarifications were then discussed in plenary.

Questions and clarifications on the proposed updated structure for the review document:

- What was meant by “issues” in this context?
 - Transparency
 - Environmental factors
 - Security
 - funding
- Etc.

Issues raised throughout today's discussion: make sure all of these issues are brought into focus and not hidden away

- What about RWMD's R&D strategy?
 - Being developed separately but some staff working on both, so overlap / joint working will happen
 - Needs signing and linking in review document
- Who is the review document aimed at?
 - It was a requirement of Government on the NDA, so they are the primary audience; but it will be made publicly available

With these comments and clarifications, the workshop agreed the proposed updated structure for the review document.

Record of all the Key Comments on Chapter 4, Part 2 – Recommendations noted at tables

- Where does the review document fit within SMS?
- Need clarity between this document and the overall management programme
- Discussion of the draft recommendations
 - Should they be made to Government?
- Scope of work has to be clear – and the process by which it will be delivered
- Detail of stakeholder engagement process is needed
- Need to link SLCs' work on interim storage strategy with RWMD plans for implementation of GDF (use 'MOP' type plan) (using 2G BRIMS as a modelling tool?)
- Include NDA's plan on how to manage / link sites LTPs and repository plan (including scheduling)
- No encouragement of waste hierarchy consideration on need for storage
- Suggest insert an additional bullet on p.39 "understanding the impact of new build"
- Recast the review document to reflect storage systems / solutions rather than 'buildings'
- Make sure that the guidance documents on monitoring / inspection and life limiting features are fit for purpose (i.e. recognise differences in wastes / hazard level etc.)
- Need action to develop / make more visible plan 'B' if plan 'A' fails (i.e. GDF)
- What are the 3 (ish) key points you want the reader to go away with? E.g.
 - Baseline – (including high hazards and engineered storage)
 - Where are we are going – GDF
 - What are the barriers to getting there are

- What key actions are needed to get there
- Where does 100 years come from? Either underpin this better, or come up with better value
- Does NDA have a broader role in developing a wider consensus on strategy that is consistent across UK (including Scotland) and local planning. and robust against changes of administration (i.e. Governments)?
- Shouldn't NDA provide the framework for contingency planning (e.g. GDF delayed until, say, 2080)?
- Would it be sensible to take a step back, publish this review document as current status without specific recommendations, formulate a strategy at more leisure that can take account of the CoRWM recommendations on interim storage that will be published early next year (estimated March 2009)?
- Recognise the need for further stakeholder discussions as part of strategy development. Where does the 'optimisation' opportunity recommendation come from? Proper stakeholder debate needed
- Identify the knowledge gaps which must be filled to enable a strategy to be developed – then derive the list of topics and their content
- Believe that NDA is already reviewing historical LoCs?
- Things might change when you look at the baseline in developing the strategy
- The consolidation of MoD materials – and an NDA site taking it – has serious planning and political implications
- On-site storage is accepted politically but that doesn't mean that a particular site will be prepared to take responsibility for others' material. Some locations are isolated, but may not be good as they don't have the infrastructure. Transportation and safety are crucial factors
- The review document's recommendations should be specific to the its purpose – i.e. focussing on existing and planned stores, and tailoring recommendations to its scope
- Agree a series of more detailed reviews – what are priorities for future work?
- Should there be an option that if the GDF became available on schedule, future stores plans be reviewed in accordance with the new timescales
- What is the audience for this review? – final page of the review document (p.39) proposes recommendations to Government. Is this the audience?
- Do these recommendations reflect the status quo for wastes in the UK, their present storage and future deliverable plans? Is tone of the report right or accurate? Presently no! (Worse. They presently are inadequate as recommendations)
- Can you base the current set of recommendations on the review document?
- Does the review document raise more questions than answers?

- Is it “good news for government and public”?
- Are 100 years stores realistic – e.g. are existing store extensions realistic? And in addition to the civil, mechanical, inspectability aspects for better stores, have issues such as location, climate change, infrastructure, man-made intervention, been fully taken into account? Need to consider also -
 - Contrast of engineered longevity stores
 - Engineered longevity store and regular top-ups
 - Poor stores that will not last
- Storage systems more than storage design
- Need to build in flexibility to changes e.g. repository date
- A standard, consistent “approach” to storage systems with respective inputs is needed, including -
 - Records / package identification
 - Condition monitoring and inspection
 - Approach for packaging design and manufacturing standards
 - Knowledge management e.g. a national standard that addresses fit-for-purpose storage regimes / systems
- A National Forum for geological disposal should include interim storage as an integral component
 - Consolidation, rationalise these forums and amend Terms of Reference – include accountability
- Need a consolidated set of guidance documents for waste characterisation, treatment, waste packages. HSE lead / EA input – link with transport requirements
- Must take into account inter-generational issues
- Commercialisation and introduction of competition may conflict with meeting national strategic imperatives
- Efficiency and scale of support functions is growing for SLCs – this conflicts with making technical progress and doing the job
- Impact of financial management on creating a national best practice for storage (as well as other areas)
- Recommendation is too prescriptive and issues / forward programme will be raised in a next storage document (e.g. NDA Storage Strategy)

4. Next Steps

- Report of this meeting to be circulated within around 2 weeks of the workshop date (i.e. approximately two weeks after 28/10/08)
- NDA to address the comments from this workshop into an updated version of the review document; and to provide progress updates on this via the bi-monthly Convenor email updates
- Any additional comments from participants to NDA by end November
- NDA to produce a timetable for process forward once the workshop record circulated
- NDA to consider the need for a further workshop to discuss the updated review document
- NDA to consider a task force to consider the key review outputs, e.g. develop an industry code of practice for conditioned waste stores

5. Jargon used during the workshop

LoC	Letter of Compliance
CoRWM	Committee on Radioactive Waste Management
ILW	Intermediate Level Waste
GDF	Geological Disposal Facility
LTP	Lifetime Plan
SLC	Site Licence Company
OCNS	Office for Civil Nuclear Security
NGO	Non-Governmental Organisation
USNRC	United States Nuclear Regulatory Commission
NDA	Nuclear Decommissioning Authority
MoD	Ministry of Defence
SMS	Strategy Management System
EA	Environment Agency
SEPA	Scottish Environment Protection Agency
HSE	Health and Safety Executive
RWMD	Radioactive Waste Management directorate
MOP	Magnox Operating Programme
BRIMS	British Radioactive Waste Information Management System

6. Attendees

Fergus	McMorrow	Copeland Borough Council
Marion	Hill	CoRWM
David	Broughton	CoRWM
Robert	Jackson	Defra
Bruce	Cairns	Department for Business, Enterprise and Regulatory Reform (BERR)
Steve	Whittingham	Department for Transport
Alan	Mowat	Dounreay Site Restoration Ltd
David	Brazier	Environment Agency
Clive	Williams	Environment Agency
Jean	McSorley	Greenpeace UK
Neil	Blundell	HSE (Nuclear Installations Inspectorate)
Peter	Burrows	HSE (Nuclear Installations Inspectorate)
Kenneth	MacDougall	Hunterston Site Stakeholder Group
John	Roberts	Immobilisation Science Laboratory
Peter	Ireland	Magnox North Ltd
Steve J	Walters	Magnox South
Fred	Plumb	Ministry of Defence
Richard	Flynn	NDA (Nuclear Decommissioning Authority)
James	McKinney	NDA (Nuclear Decommissioning Authority)
Graham	Jonsson	NDA (Nuclear Decommissioning Authority)
Trevor	Jones	NDA (Nuclear Decommissioning Authority)
Lisa	Hughes	NDA (Nuclear Decommissioning Authority)
Colin	Rhodes	NDA (Nuclear Decommissioning Authority)
Steve	Barlow	NDA (Nuclear Decommissioning Authority)
Michael	Calloway	NDA (Nuclear Decommissioning Authority)
Fred	Barker	Nuclear Legacy Advisory Forum (NuLeAF)
Allan	Holliday	Nuclear Legacy Advisory Forum (NuLeAF)
Stewart	Kemp	Nuclear Legacy Advisory Forum (NuLeAF)
Alyn	Jones	Nuclear Legacy Advisory Forum (NuLeAF)
Julian	Swainson	Nuclear Legacy Advisory Forum (NuLeAF)
Michelle	Skelland	RSRL
Sam	Cox	RSRL / UKAEA
Elizabeth	Gray	Scottish Government
Stuart	Hudson	Scottish Government
Jim	Cochrane	SEPA (Scottish Environment Protection Agency)
Sam	Moore	Sellafield Ltd
Bernard	Wheeler	Sellafield Ltd