



BANNG
Blackwater Against New Nuclear Group



BANNG UP TO DATE

September 2013

*An occasional Newsletter to update and provide information for supporters of the
Blackwater Against New Nuclear Group (BANNG)*

ACTION, PLEASE

Managing Radioactive Waste Safely (MRWS) – New Consultation and Public Engagement
(See Item 2)

We would ask all supporters to make a response to the Government's new consultation entitled Review of the Siting Process for a Geological Disposal Facility. This concerns the search for a site on which to build a repository to store the nation's radioactive wastes, past and future. Bradwell could be in the frame.

BANNG will be responding to this consultation but the more responses received by the Government, the better.

You can find out more by downloading the consultation document on the link below.

<https://www.gov.uk/government/consultations/geological-disposal-facility-siting-process-review>

Our response to the previous consultation on this was sent to you as BANNG Paper No. 19 and you may find this helpful with your response.

The deadline for responses is 5 December and we will be contacting you again about this consultation before then.

This Issue in Brief.....

- Editorial (p. 3) - Andy Blowers poses the question – 'Is new nuclear dead in the water?'. New build at Bradwell may look a less imminent threat but the site is looking distinctly like a long-term nuclear waste dump. All is not quiet on the nuclear front and we must remain vigilant.

- Three new threats (p. 4) - Bradwell's potential role as a long-term waste dump has been highlighted by three recent developments:
- one, the threat to the estuary from discharges of radioactivity from dissolving Fuel Element Debris (FED);
- two, the possibility of importing wastes from other sites for storage at Bradwell;
- three, the search for a suitable site for a deep repository to take all the nation's dangerous nuclear wastes.

Instead of the promised rapid clean-up and restoration, the Blackwater communities are facing the prospect of living with nuclear risk indefinitely.

- News (from p. 6 onwards) - including reports on the latest developments at Sizewell, actions of BANNG and future activities.

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Editorial - Is New Nuclear Dead in the Water?

Things seem to have gone deadly quiet on the new nuclear front – at least as far as any progress for new build is concerned. For months now, it seems, the Government and EdF have been mired in endless negotiation over the price to be paid to get Hinkley Point up and running. On the one hand, the Government is trying to set a contract with a strike price that is high enough to keep EdF in the ring but not so high as to blatantly and unfairly subsidise new nuclear. On the other, EdF, a company subsidised by the French state but in financial tribulation, appears to be holding out for a higher price and a longer term contract than the Government is prepared to concede.

The future of new build in the UK hangs precariously on the outcome of the deal that may – or may not – be struck. Each party is under pressure. The UK Treasury, under a Chancellor gung-ho for developing gas, including fracking, is exerting downward pressure on the Government negotiation while, on the other side, EdF has been deserted by its one-time partner Centrica and is anxiously casting about for other partners willing to stump up the necessary investment. The risks are high and delay places the whole nuclear project in jeopardy.

Even if agreement is found on price, the investment still has to be committed and already time has slipped by. Meanwhile, the so-called ‘energy gap’ which nuclear was meant to bridge is being filled by permissions for gas supply. And, ‘fracking’ for gas under Britain’s green and pleasant land brings the probably illusory promise of cheaper energy and security of supply. Gas is not only a threat to nuclear’s future but, for the short-term at least, may well retard what has been a promising development of renewable energy. And, so much for environmental security, since gas is a fossil fuel and, in the long run, may slow up the reduction in carbon emissions promised by renewables and, to some extent, by nuclear energy.

So, where does this leave Bradwell? The possibility of one or more new nuclear plants seems a distant prospect at this time. With Hinkley faltering, progress at Sizewell will be affected. Elsewhere, Japanese investment in Wylfa and bullish noises about putative investors from China and Russia in other sites enables the Government to visualise a veritable cornucopia of new nuclear activity. The reality is that none of this investment is likely to materialise soon, if at all. The longer it takes to cut a deal, the less likely it will be that nuclear will be the energy option favoured by the fickle market forces that dictate the UK’s short-term energy strategy.

Let us not be lulled into stupefaction at the lack of activity on the Bradwell front. It may look an unlikely prospect at present but, in these fickle political and economic times, things can change rapidly and we may yet find ourselves facing a new Bradwell nuclear power station. We do not intend to be caught off guard but remain ready to mount a vigorous campaign when needed.

Rather more is happening on the nuclear waste front with more immediate relevance for Bradwell. The Nuclear Decommissioning Authority (NDA) is pressing ahead with the dissolution of the Fuel Element Debris (FED) arising from the reactor cores and considering where best to store the intermediate-level wastes resulting from shut-down reactors. This could mean Bradwell storing wastes from other sites. Meanwhile, the Government is trying to find a suitable site to bury the nation’s existing stockpile of highly active wastes as well as any wastes from new build deep

underground. With a site near Sellafield having been rejected, at least for the time being, the Government is casting the net more widely and it is not impossible that sites in East Anglia may come into the frame.

In this issue we consider the prospects for the management of radioactive wastes. For BANNG's supporters the message is to keep vigilant. For the present, new build at Bradwell may seem dead in the water but we must be ready if the threat surfaces again. Radioactive wastes are a live issue both now and for the future. Our campaigning must continue to ensure safety and security for our communities both now and in the generations to come.

1. Radioactive Waste – Three Threats to Bradwell and the Blackwater

Within the last few months proposals have begun to emerge from the Nuclear Decommissioning Authority (NDA) and from the Department of Energy and Climate Change that could increase the risks from radioactive waste stored at Bradwell. First, is the proposal to dissolve Fuel Element Debris (FED) and discharge some of the residue into the river; second, is the possibility of using Bradwell as a regional store for intermediate-level waste; and, third is the possibility (hopefully distant) that Bradwell could play a role in dealing with the nation's most dangerous wastes.

Threat Number 1 –Feeding FED into the Estuary

The Blackwater estuary is shallow. It is a precious marine environment, a source of food for fish and nutrients for the cultivation of the renowned Colchester Native Oysters. It is a haven for sailing and other recreational activities and it includes some of the most precious and beautiful marshlands, which provide a sanctuary for birds and a home for rare invertebrates and wetland plants.

During the forty years of Bradwell's operation the estuary suffered from the constant recycling of cooling water which increased the temperature of the water, entrapped marine life in the pipes and bleached an area of seabed around the outfall and intake pipes. Leakages on site and discharges into the estuary posed a constant risk to the marine environment. All that ceased with the plant's closure in 2002.

Now a new threat is looming with the imminent dissolution of the Fuel Element Debris (FED), the highly radioactive casings of the fuel rods in the reactor. Dissolution would reduce the volume of the debris by a factor of 20 and, therefore, the costs of storing the wastes on site for the foreseeable future. But, efficient as the process seems to be, it creates two problems.

First, is that not all the radioactivity is contained. The NDA documents state that about 15% will be discharged into the estuary along with some heavy metals and nitrates from the dissolution process. The NDA claims that the site is suitable for receiving the aqueous discharges from dissolution. On the other hand, the Environment Agency has stated that 'the Bradwell site is sub-optimal', therefore not an ideal site for dissolution. BANNG is not satisfied with the proposal, which we consider may be harmful to human health and the marine environment. FED wastes should be packaged and stored on site for the time being.

BANNG believes a policy of 'concentrate and contain' should be preferred over 'dilute and disperse' and has urged that FED dissolution should not be allowed at Bradwell. The estuary is too shallow for effective dispersal.

We understand that dissolution testing at Bradwell is imminent, prior to full operation by the year end, hence our protest.

If dissolution goes ahead then we believe the NDA must stick to its agreement that only Bradwell wastes should be treated at the Bradwell site. The NDA is looking at the possibility of concentrating dissolution at fewer sites. Bradwell has so far been ruled out as a regional site for dissolution on the grounds that undertaking active operations would not be consistent with the site going into care and maintenance by 2015, as promised, and also that the estuary is not suitable for accepting more discharges from processing additional FED from other sites.

Further, it seems that while the short-term impacts of discharges have been deemed acceptable by the Environment Agency, the site is 'sub-optimal' in terms of the long-term environmental impacts that would occur if the dissolution plant were shared. The Environment Agency has said that such use would require strong justification. However, it is always possible for the NDA to change its mind and BANNG will remain vigilant.

For full details of BANNG's response on the dissolution proposal, see BANNG Paper No. 21 - already circulated to supporters.

Threat No. 2 – Bradwell a Regional Radioactive Waste Site?

Ever since Bradwell ceased operating in 2002 the policy has been to clean up and restore the site of the old Magnox station as soon as possible. Admittedly, the bold promise that the site would be cleared and restored to normal uses within a few years was quickly abandoned. The massive hulk of the building will continue to loom over the estuary until at least the end of the century with the graphite reactor cores it contains - because nobody knows what to do with them.

To be fair, some visible and significant progress has been made. The turbine hall has been demolished, most of the outfall barrier in the river has also gone, new storage facilities for wastes have been built. All the spent fuel has been shipped to Sellafield and most of the complex pipe work within the reactor building has gone. The reactor building is being clad in a blue grey membrane to make it less obtrusive on the skyline. Bradwell has been accorded an accelerated timetable in order to achieve a move to care and maintenance by around 2015. So far, the NDA has been committed to ceasing all operations at Bradwell by this date. So far, so good.

Meanwhile, it seems, the NDA is trying to fill up the newly-constructed waste store at Bradwell with intermediate-level waste imported from elsewhere. There appears to be spare capacity in the store designated for Bradwell's wastes. Under some options being considered for 'optimising' (in effect, economising) the number and location of waste stores, waste from either Sizewell A station up the coast in Suffolk or from Dungeness A in Kent, or from both, would be brought to Bradwell. This would make Bradwell a regional waste store.

BANNG and groups at other sites believe that wastes should be managed where they originate until such time as they can be moved to a permanent store. Moving wastes around from site to site is dangerous and exposes material to the public and potential terrorist diversion.

BANNG Paper No. 20 (already circulated) gives details of our objections to the regional store idea

Threat No. 3 – Bradwell as a National Radioactive Waste Store?

It may seem a far-fetched idea that Bradwell could ever be considered as a site for a permanent national store or repository for the nation's most dangerous high activity wastes. But, in the desperate search for solutions to this most intractable of problems, nothing can be ruled out.

For the past four years the Government has concentrated its attention on getting Cumbria to volunteer to host a deep disposal facility. Cumbria – and more specifically West Cumbria – was the only area to express an interest. And you can see why. Already, most of the nation's high-level wastes are stored (rather inadequately) at Sellafield. West Cumbria remains heavily dependent on the nuclear industry for its economic survival. Not surprisingly given the jobs, the investment that nuclear brings and the lack of opportunities, the population can be counted on to support the industry, or at least not to oppose it.

At the beginning of the year the plan ran into the buffers when Cumbria County Council voted against taking the process of site selection further. This was sufficient, at the time, to overrule the two West Cumbrian District Councils which were willing to proceed. So, impasse has been reached, forcing the Government to reconsider its position.

This it is doing this Autumn, with a national consultation on ways forward. It is suspected that the Government will try to maintain the voluntary process while putting pressure on councils across the country to volunteer to enter a process to find a site for a repository. While Cumbria cannot be ruled out there will no doubt be an effort to find willing councils elsewhere. And there will certainly be various inducements and compensation offered to encourage them to bite the bullet.

Which brings us to Bradwell. Way back in the 1980s, Bradwell, along with another Essex site at Potton Island, was identified as a possible location for a deep repository. Geologically speaking Essex does not seem a likely site but, if local councils were tempted, then it cannot be ruled out.

BANNG thinks it highly unlikely that Essex would be considered. But, it is not impossible and that is why we are seeking meetings with local councils to point out the folly of contemplating large volumes of the most radioactive wastes being transported and deposited deep underground. The Essex coast is very low-lying and it is difficult to conceive the massive disruption and danger such a project would bring. The repository would be deep underground and have a volume of 6 to 11 Albert Halls. It would bring decades of storage, construction and operation and then hundreds of thousands of years of risk to untold generations.

We believe it must not happen and that the local community should not entertain the possibility.

(BANNG's views on the process for finding a suitable site for managing radioactive wastes are set out in Paper No. 19 - already distributed.)

2. Managing Radioactive Waste Safely (MRWS) - New Consultation and Public Engagement

Following on from its failure to get Cumbria to volunteer to proceed in the search for a site for the national repository for high-level wastes (see story above), the Government has decided to have another go. This time the search will be widened to include all areas up and down the country. On 12 September a new consultation was launched under the title, Review of the Siting Process for a Geological Disposal Facility.

While maintaining the voluntary approach by which communities must agree to participate in the search and have the right to withdraw if they are unhappy, the document makes some important changes from the previous approach. One is to make District Councils, and not County Councils, the primary decision makers. Another is to make it clear that all-high level wastes, including those from new build, will be placed in the repository. Other points concern the compensation communities will receive for hosting a site, the importance of raising public awareness from the outset and the need for better geological information.

The Government will be holding a series of workshops during the Autumn for stakeholders and will try to capture the public's view through a series of dialogue groups. A cynical view would be that this is an elaborate charade designed to exclude Cumbria County Council so that councils in West Cumbria close to Sellafield can once again volunteer to host a repository. On the other hand, the Pandora's box is opened and councils elsewhere might want to have a piece of the action, especially if there are benefits to be had.

As a possible site for new build Bradwell comes into the reckoning as a suitable site for long-term waste storage. Sites with waste stores are obvious targets in the search for a site for a repository. BANNG intends to respond to this consultation and urges supporters to make individual submissions. The more submissions received from the public, the better. You can find out more by downloading the consultation document on the link below.

<https://www.gov.uk/government/consultations/geological-disposal-facility-siting-process-review>

3. News from Sizewell

Sizewell is next in line after Hinkley Point for a new nuclear power station and EdF has been busily preparing the ground and softening up the local communities. But, there is growing opposition in east Suffolk and BANNG has given its support to the local groups there.

The local MP and council have basically succumbed arguing that nuclear development is both necessary and inevitable at Sizewell. All that can be done is to mitigate the disruption and urbanisation as much as possible.

Opponents of the power station simply do not accept that Sizewell C is a done deal. At first, opposition was minimal but it received a huge boost at a public meeting last February in Yoxford

which was addressed by BANNG Chair, Andy Blowers, and well-known Suffolk activist, Pete Wilkinson. The meeting, which was very well attended, proved a turning point for Together Against Sizewell C (TASC). The group now has 20 core activists and 300 key supporters. Though still small it represents a significant shift in an area with traditional support for nuclear energy.

The campaign is becoming increasingly visible with posters in the villages and a march being planned. TASC has campaigned for a much wider Emergency Planning Zone than the present two and a half miles or the four miles being proposed. TASC intends to leaflet all homes and offices, farms and holiday homes within a twenty mile radius of Sizewell warning residents that they, like the people near Fukushima, live in an area which could become blighted by radioactivity if a serious accident occurred.

As Pete Wilkinson remembers, 'We all look back to that February meeting when villages around Sizewell were given the opportunity to unite against Sizewell C. The indications are that it is an opportunity people will accept'.

Sizewell is linked to Bradwell in several ways. Under competition rules EdF is committed to developing at Hinkley Point and Sizewell and, therefore, must dispose of its Bradwell site to another operator. But, to protect EdF's position, development cannot take place at Bradwell until there is a go-ahead for a new power station at Sizewell. The two sites are also connected by the proposal to ship intermediate-level wastes from Sizewell A to the ILW store at Bradwell (see story above). So, we have a practical as well as a moral interest in continuing to support the anti-Sizewell campaign.

4. News from the Nuclear Front

BANNGers have been active on various fronts. Our activities include,

Andy's appointment to the Government's Stakeholder Reference Group:

- o Andy Blowers has just been appointed as one of three members of the Stakeholder Reference Group which will oversee the Government's consultation on the siting process for a Geological Disposal Facility (GDF) (see item 2 above). Andy is well placed to undertake this role with his experience on the Radioactive Waste Management Committee (RwMAC) and the Committee on Radioactive Waste Management (CoRWM).

- Producing three detailed responses to consultations:

- o Call for evidence on the process for siting a geological repository (Paper 19), prepared on behalf of BANNG by Andy Blowers;

- o Options for locating intermediate-level waste stores (Paper 20), prepared on behalf of BANNG by Varrie Blowers;

- o Optimising the location of dissolution facilities for FED (Paper 21), prepared on behalf of BANNG by Barry Turner

These are all covered earlier in this issue.

- DECC/NGO Nuclear Forum:

- o Andy Blowers co-Chairs the Forum with Hergen Haye, Head of the Government's nuclear programme. Barry Turner, BANNG's Vice-Chair, represents the group. Recent meetings have focused on radioactive waste management, future energy scenarios, emergency planning and radiation and health. The Forum provides an opportunity for environmental groups across the country to inform, criticise and, where necessary, oppose Government policy on nuclear issues.

- DECC/NGO Workshop, held on 18 June, 2013:

- o Varrie Blowers, Secretary of BANNG, attended a workshop at DECC on 18 June, which was addressed by the Minister for Energy, Baroness Verma. The purpose of the workshop was to hear views, concerns and suggestions from NGOs about how the Department should take forward the siting process for a geological disposal facility, to gain an in-depth understanding of the issues and to debate and explore possible solutions. The Department was at an early stage in its consideration of how the site selection process could be improved. The representatives of the NGOs put forward suggestions and criticisms, especially regarding (a) the proposal to store new wastes with the legacy wastes and (b) the Minister's view that finding a location should precede ascertaining that the geology was suitable. DECC was urged to ensure that the public was fully engaged, perhaps through a nationwide publicity campaign, since storage of the nation's nuclear wastes is a national problem.

The Government is now beginning its re-run of the consultation on finding a community that would be willing to host the nation's nuclear wastes (see item 2 above). You can find out about this consultation at the following link:

<https://www.gov.uk/government/consultations/geological-disposal-facility-siting-process-review>

- Andy's Mission to Korea:

- o Andy Blowers as a former member of the UK's Committee on Radioactive Waste Management (CoRWM) was invited to South Korea in June to give seminars on 'Finding A Way Forward for Radioactive Waste Management'. He presented talks to the National Assembly, to the country's main scientific research institute and to a workshop in the capital, Seoul.

- Meetings with councils:

- o BANNG has been seeking meetings with the local councils to increase awareness of the many issues surrounding Bradwell and outlined in this Newsletter. Meetings are being arranged with Colchester Borough Council and Tendring District Council. Unfortunately, neither Maldon District Council nor Essex County Council is willing to meet with us at the present time.

- West Mersea Town Council – Bradwell Group:

- o the Bradwell Group has not met for some time but a meeting has now been arranged for 18 October

- Bradwell Manoeuvres:

o On 7 September a fleet of BANNG boats had intended to sail across the Blackwater and land on the Bradwell beach to demonstrate against proposals to discharge radioactive effluent from dissolution into the Blackwater. This was to be followed by a barbeque on the beach. Unfortunately, this had to be cancelled due to high winds on the day. Instead a BBQ was held at West Mersea and a photo-shoot took place in the high winds.

Vice-Chair of BANNG, Barry Turner, who was to have led the fleet in his boat Sula 2, voiced the disappointment felt by those who were kept in port. 'We had to cancel because of unsuitable weather conditions. The plan was to land on the Bradwell beach with banners and placards but this was not feasible because of the rough sea. 'BANNG did not want people to come to grief, especially when they are demonstrating about an issue of public safety'.'

• **BANNG in the news:**

Andy Blowers was interviewed on Look East and Anglian TV in relation to the disclosure that the Nuclear Decommissioning Authority was proposing to store intermediate-level nuclear waste from other sites at Bradwell. Articles on this and other issues have appeared in local papers.

5. Your Support

Thank you for your continuing support. Now that the nuclear situation is 'hotting up' - with the search about to start for a Geological Disposal Facility, discharges of radioactive FED into the estuary, the possibility of a regional intermediate -level waste store at Bradwell - please encourage your friends and family to support BANNG.

The next edition of the Newsletter will appear in the New Year. Please remember that subscriptions (we suggest £5 per supporter) are due at the beginning of the year and should be sent to the BANNG Treasurer, Lynn Hartley, Ray View, The Strood, Peldon, CO5 7QL.

IF YOU HAVE AN E-MAIL ADDRESS, PLEASE LET VARRIE BLOWERS KNOW (SEE BELOW). IT MAKES IT EASIER TO SEND YOU BANNG DOCUMENTS.

6. And Finally

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