

Draft Strategy

Published September 2010 for Consultation



Please complete your responses in the boxes provided. You can send this form back by letter, fax or email.

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The questions below are derived from the Draft Strategy 2010 for consultation (available at www.nda.gov.uk). In addition we are happy to receive comments on how strategy or its implementation can be improved, and we will consider these where appropriate. When considering responses to this consultation, the NDA will give greater weight to responses that are based on argument and evidence, rather than simple expressions of support or opposition.

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Do you agree to your responses to this consultation being published?

Yes

Yes

No

Consultation Questions

3.1 SITE RESTORATION

3.1.1 Decommissioning and Clean-Up

1. What are the most important factors for the NDA to consider when developing estate-wide, good practice principles for decommissioning and clean-up, and why?

ANSWER: -

It is important that the heritage value of the contribution the nuclear industry has made to our recent past is understood by future generations. Therefore we would urge the NDA when developing good practice for decommissioning and clean-up to take into account the objective set out in *Planning Policy Statement 5: Planning for the historic environment* (PPS5) 'to ensure that opportunities are taken to capture evidence from the historic environment and to make this publicly available, particularly when a heritage asset is to be lost'.

Policy HE12 of PPS5 sets out the principles guiding the recording of information related to heritage assets. The NDA has expressed the intention to construct the National Nuclear Archive (NAA) in Caithness. However, further detail is required on the collecting policy, and how key records will be maintained in perpetuity before we can be confident that the requirements of Policy HE12 are met. We also require clarification that the collection will have a broad range, and also include classes of records that have perhaps traditionally not been collected by National Archives, including architectural, plant and machine drawings, and social history. The NAA is not designed to curate artefacts and other strategies will need to be put in place to preserve this material.

3.1.2 Land Quality Management

2. What factors should the NDA consider when exploring opportunities for managing contamination in-situ?

ANSWER: -

3.1.3 Site End States

3. What are your views on the NDA's preferred strategy to restore a site to a condition suitable for its next planned use?

ANSWER: -

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4. What factors should the NDA take into account when determining how much restoration is sufficient?

ANSWER: -

5. Do you agree with the NDA's expectation that none of our facilities will be preserved for national industrial heritage? If not, why not?

ANSWER: -

English Heritage recognises that the physical preservation of historic nuclear facilities may not always be possible due to contamination and problems with security, and long-term management, and thus accepts that preservation of these singular facilities is difficult. However, where these issues can be addressed, the heritage value would be a factor for the NDA to take into consideration in line with PPS5 policies and, where heritage value is established, sites should be considered on a case-by-case basis. Discussions between the NDA and each of the Home Countries should be pursued so that a common approach can be adopted towards this shared UK-wide heritage. Compiling a record of the technological processes which took place within (and which form the most important aspect of their heritage value) will usually serve as a way of capturing this aspect of national nuclear industrial heritage.

3.2 SPENT FUELS

3.2.1 Spent Magnox Fuel

6. When evaluating options for the management of spent Magnox fuel, what factors are most important for the NDA to take into account and why?

ANSWER: -

3.2.2 Spent Oxide Fuel

7. When evaluating options for the management of spent oxide fuel, what factors are the most important for the NDA to take into account and why?

ANSWER: -

3.2.3 Spent Exotic Fuels

8. When evaluating options for the management of exotic fuels, what factors are the most important for the NDA to take into account and why?

Draft Strategy

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ANSWER: -



3.3 NUCLEAR MATERIALS

3.3.2 Uranics

9. In the development of future management options for uraniums, what factors are most important for the NDA to take into account and why?

ANSWER: -

3.4 INTEGRATED WASTE MANAGEMENT

10. What are your views on the principles we describe for the management of waste on our estate?

ANSWER: -

3.4.1 Higher Activity Waste

11. What are your views on consolidating storage of radioactive waste at a reduced number of sites and on the possibility of near surface disposal of some ILW at or near existing nuclear licensed sites?

ANSWER: -

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3.4.2 Lower Activity Waste

12. What comments do you have on how we should implement the strategy set out here?

ANSWER: -

3.4.3 Non-Radioactive and Hazardous Waste

13. Do you think there are opportunities for managing non-radioactive and hazardous waste better across the NDA estate, and if so what are they?

ANSWER: -

3.5 BUSINESS OPTIMISATION

3.5.1 Revenue Optimisation

14. When evaluating the opportunities to dispose of assets or pursue additional commercial revenue, what factors are the most important for the NDA to take into account and why?

ANSWER: -

As a NDPB the NDA will have regard to 'The disposal of heritage assets'.

http://www.helm.org.uk/upload/pdf/Guidance_on_disposals_June_2010.pdf?1287158742

This includes guidance in paragraphs 2.8 and 2.9 on items of historic, technical and scientific importance, as well as machinery and para 10.3 reiterates the importance of the early identification of heritage assets.

Draft Strategy

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4.0 CRITICAL ENABLERS

4.1 Health, Safety, Security, Safeguards, Environment and Quality

15. What factors do you believe the NDA should take into account in seeking the optimum standards of health, safety, security and environmental performance in the delivery of environmental restoration?

ANSWER: -

4.2 Research & Development

16. What do you think about the NDA taking a broader role by coordinating R&D strategy for decommissioning and clean-up across the wider nuclear sector?

ANSWER: -

4.3 People (incorporating Skills and Capability)

17. What are your views on the NDA's proposal that in order to deliver our People Strategy, we should extend our partnerships to other parts of the nuclear industry?

ANSWER: -

4.8 Information and Knowledge Management

18. To what extent should the NDA focus on knowledge management compared to information management compliance?

ANSWER: -

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4.9 Socio-Economics

19. What alternative approaches could be considered in the delivery of our socio-economic activities?

ANSWER: -

4.11 Transport and Logistics

20. What emphasis should the NDA place on using transport rather than duplicating assets and capabilities in numerous locations across our estate?

ANSWER: -

Any other comments

English Heritage publishes all responses to consultations on its website:

<http://www.english-heritage.org.uk/professional/advice/government-planning-policy/responses-to-the-consultation/>

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