

# Memorandum

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and  
ASSOCIATES

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To: **Charles Barnet** Shutdown Sizewell Campaign

M3093-a1

cc: Judith Hollands NDA  
James Tott Magnox South  
Peter Wilkinson Wilkinson Consulting  
Peter Lanyon

From: **John H Large**

19 September 2007

Subject: **SIZEWELL A - FED CONSULTATION**

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I refer to your instruction of 18 August 2007 for Large & Associates to review the publicly available and referenced documentation relating to the Sizewell A FED (Fuel Element Debris) Public Consultation. I am reporting to you on this date because I am aware that in its letter of 10 September Magnox South set the closing date of 21 September for any feedback on the adequacy of the information it has made available and which is to form the basis of the FED consultation.

On 22 August I requested from both *EnergySolutions* (Magnox Electric) and the Nuclear Decommissioning Authority (NDA) seven specific documents (see Appendix D) of the references cited in what seems to be the substantive consultation document *Generic Option Analysis Report* circulated by Magnox South to registered consultees. I have to report to you that I have been unable to obtain these requested and any other documents from *EnergySolutions* or the NDA during what is now the 4 week intervening period since I first lodged my request.

Also, I have briefly reviewed the information presented in the *Sizewell A FED Consultation* website (<http://www.sizewellconsultations.com/>). Although the website provides certain data (for example, the volumes of FED in store on the site), this and other information is somewhat scant in detail and generally unsubstantiated, and there is very little on aspects of nuclear safety, public dose and environmental impact arising from the proposed means of managing the FED. Although the website refers to two technically based reports that might be of interest, both of these reports are not available for downloading.

I note that it does not appear that a BPEO (Best Practicable Environmental Option) and BPM (Best Practicable Means) have been undertaken and applied to the Sizewell A site or, if these studies have been completed, such are not included in the present consultation process. In the absence of these or similar multi-attribute type analyses and a site-specific environmental impact assessment, it is not clear to me how the opinions of and input from consultees might best contribute to the outcome of the consultation.

In summary and disappointingly, I report to you that I have not been able to assess if the provision of the additional information that I have sought from *EnergySolutions* and the NDA would add to the understanding of those involved in the consultation process. I am of

the opinion that compliant management of Magnox fuel element debris (FED) is technically complex, includes risk of accident, physical protection and security issues, and the range of management options available give rise to varying environmental and radiological health impacts. So much so that I judge the information currently provided by *EnergySolutions* not to be adequate for your group, Shutdown Sizewell Campaign, to be sufficiently informed to fully and meaningfully participate in the FED consultation process.

I have copied this note to *EnergySolutions* and the NDA so that they are fully informed on what I consider to be a very unsatisfactory response to and outcome of my requests for further information on behalf of the Shutdown Sizewell Campaign.

#### **APPENDIX I DOCUMENTS REQUESTED**

Request of 22 August 2007:

- 1) Radioactive Waste Inventory for Sizewell A Power Station 2004/5, TS/E&TS/SXA/REP/0029/05, September 2005
- 2) Magnox Electric plc Quinquennial Review of Decommissioning and Waste Management Strategies, April 2000
- 3) Strategy for the Management of Fuel Element Debris at Bradwell, Hinkley Point A, Oldbury and Sizewell A Power Stations, RDU/S&A/GEN/REP/0037/00, April 2001
- 4) Strategy for the Management of Fuel Element Debris at The Magnox Reactor sites, MDG/300062N, February 2002
- 5) Arrangements for the Development of Waste Management and Decommissioning Strategies for Magnox Reactor Sites, RS/E&TS/MI/004, May 2006
- 6) Process Report for Bradwell Fuel Element Debris (FED) Dissolution Study, 61050001-000-000-111-REP-0001
- 7) Zero Liquid Discharge Magnox Dissolution Options Study Datapack, TR/89217/003, January 2007

Additional Request of 18 September 2007:

- 8) Fuel Element Debris Disposition – Technical Optioneering Report, March 2007
- 9) BPEO Study for the Management of Magnox FED at Bradwell Nuclear Power Station P434/R194/Issue 1 September 2006 – Nuclear Technologies plc