

LLWR PROGRESS REPORT TO WEST CUMBRIA SITE(S) STAKEHOLDER GROUP – JANUARY 2012

Dennis Thompson, Managing Director, LLW Repository Ltd

It has been very eventful at LLWR since our last report to the WCSSG. On 3rd October 2011 I replaced Dick Raaz as Managing Director of LLW Repository Ltd. I'm sure those that know him will agree - Dick is unforgettable. He has a unique leadership style and an acute ability to identify, direct, and then see through a series of changes in an organisation. In the 3½ years of Dick's tenure at the Repository he has done exactly that. The Repository is a dramatically different place than it was when he came, and we are grateful for his leadership.

Environmental Safety Case

On 1st May 2011 LLWR submitted its Environmental Safety Case (ESC) to the Environment Agency (EA) as scheduled. The ESC comprises in excess of a 2,000 pages of detailed, technical information to support our argument for continued operations at LLWR. The EA have now begun the daunting task of reviewing and validating this information in order to reach a conclusion and determine whether to renew LLWR's disposal authorisation for low level radioactive waste. It is our understanding that this process will take approximately two years and we anticipate a response towards the end of 2013.

To date, ten responses to Environment Agency Issue Resolution Forms (IRFs) have been returned, covering optimisation, stakeholder engagement, on-going maintenance of the ESC, Board involvement, and tsunami. Work continues on responses to other IRFs and a number of informal requests for further information

Although we have submitted the 2011 ESC, the work does not stop there – further updates and modifications will be made to the ESC as it progresses through the review process. This is an acceptable and appropriate practice for this type of project. Additionally, those aspects of the safety case that can be implemented ahead of re-authorisation will be addressed.

Site Optimisation and Closure Works Planning Application

An essential component of the ESC is the closure cap for the Repository. In order to demonstrate that LLWR can deliver this element of work we have been running a parallel process to determine the long term development and operation of the site and map out the various phases the Repository will go through. This work has culminated in an overarching planning application that captures all forecasted works from present to 2080 providing visibility and clarity for the operational lifetime of the site. The application entitled 'Site Optimisation and Closure Works' includes:

- The permanent retention of Vault 9 for the disposal of waste (currently storage only).
- Permanent higher stacking in Vault 8 (temporary permission to 2013).

- Future Vaults 9a to 14 for the disposal of waste.
- Phased capping of the trenches, existing vaults and future vaults.
- Installation of a cut-off wall and secant pile wall.

and was submitted to the Waste Planning Authority at Cumbria County Council on 30th June 2011.

We are currently in discussions with the County Council about appropriate break points in the phasing of the implementation to allow for changes in policy, technology, inventory forecasts, etc and to provide comfort for stakeholders, giving them the confidence that interventions can be made should it be deemed necessary.

It must be reiterated that the submission of an overarching planning application does not relieve LLWR from the substantiation work that will precede each phase of implementation. Nor does it preclude applying lessons learned and striving for continuous improvement.

National Waste Programme

Implementation of the Waste Hierarchy through metals recycling and incineration routes has seen a reduction of approximately 25% of waste shipments to the LLWR site. This percentage will increase as our services mature and we work with our customer base to firmly establish and embed the general principles of the Waste Hierarchy. This work is vitally important as diversion of waste from the Repository to alternative and appropriate treatment or disposal routes, preserves this valuable national asset for decades to come and for future generations.

Logistics Services

We have made good progress with container suppliers. Manufacture is now up and running with the two suppliers and we are meeting the requirements of our customers. Good progress has been made with Direct Rail Services Ltd in establishing a joint operation with LLWR to deliver cost effective multi-modal transport services for Low Level wastes. The management system underpinning these arrangements has been produced and is currently undergoing final approval. This service will go live on 1st April 2012.

Berkeley Boilers Project (Magnox Ltd)

The removal and disposal of 5 heat exchangers at the Berkeley site, continues to progress well. The project documentation and the Trans-Frontier Shipment paperwork was submitted ahead of schedule and approved last week. At this point in time, the project is progressing on schedule with excellent cooperation between the LLWR and the Berkeley Boiler site. This £8M contract has been awarded to Studsvik.

Multi Element Bottles Project (Sellafield Ltd)

The project continues to progress well. LLWR's involvement with the project has now facilitated transportation of 36 MEB's. The project is on target for the removal and treatment of a minimum of 54 MEB's before the end of the financial year – this is ahead of the base schedule.

PCM Decommissioning Programme

This is a long standing project established to address the decommissioning and eventual demolition of legacy waste facilities at the Repository. It involves multi work faces on four of the 5 remaining PCM Magazines (originally 10) and we are benefiting from the LFE (learning from experience) that this approach is uncovering. Whilst we are behind schedule on some of the work fronts and ahead of schedule with others, it is fair to say that good progress has been made and we remain confident that the project completion schedule will be met.

Maintenance

I am disappointed to report that an Office of Nuclear Regulation (ONR) review of maintenance practices identified deficiencies in our maintenance procedures. This resulted in an extensive internal review and overhaul of the programme. We brought in expertise from Sellafield and the USA to assist with the review and this has resulted in a long list of upgrade requirements. The most urgent of these have already been completed and comprehensive operational training is ongoing. I would like to stress that the safety of personnel and the environment remains at the forefront of our minds.