

## **ENVIRONMENT AGENCY BRIEF FOR WCSSG DECOMMISSIONING SUB-GROUP**

### **1 Introduction**

This brief summarises provides an update on key and emerging issues we have with the Sellafield decommissioning programme.

Note that it should be read in conjunction with our most recent reports to WCSSG main committee.

### **2 Progress on current Issues**

#### ***2.1 Lifetime planning and risk reduction***

In our previous report, we made reference to the continued discussions over Lifetime Plan (LTP) 08 and funding shortfalls with the other regulators, NDA and Sellafield Ltd, and our advice provided to Sellafield Ltd on the process for justifying (from an environmental perspective) any significant changes to the Lifetime plan brought about by funding shortfalls.

To address concerns expressed by the regulators regarding the deferral of work this year that impacts on decommissioning milestones, a new project is being sponsored by Sellafield Ltd, the primary objective of which is to work on a new justification for LTP 2009 and 2010. We are supporting this initiative which will review the risks from high hazard facilities, their potential consequences and appropriate mitigating actions. It is our understanding that if appropriate 'justifications' are made for prioritised delivery of work, then NDA will provide the available funding, where necessary. We understand that Sellafield Ltd intends to engage wider stakeholders on this work.

The clean-up programme for the Sellafield site is being affected by significant technical and resource issues. We remain concerned that delays in clean-up and decommissioning will result in increased environmental impacts such as increased discharges, additional solid wastes and increased contamination of land and groundwater. Furthermore, the longer clean-up takes the greater the potential for an incident with environmental consequences. Our principal concerns relate to the storage of legacy waste and fuel in ponds and silos. There has been significant delays with implementing this programme and some important clean up milestones now extend well beyond dates specified in NII legal specifications. We would therefore like to see new ways of working to help to secure a successful risk reduction programme for legacy ponds and silos. This should include the use of better performance indicators to measure and demonstrate progress. We are working with Sellafield Ltd, NDA and NII, and promoting the development of a Sellafield clean-up programme to bring greater transparency, clarity and integration of the work to achieve successful and accelerated risk reduction.

## **2.2 Workshop**

We participated in a Decommissioning Sub Group Workshop, the primary objective of which, was to inform and prioritise the subject matter of subsequent meetings. This Workshop was well supported by Sellafield Ltd and NDA. The outcome of this workshop is supported by the Environment Agency.

## **2.3 Site tour**

We also took part in a decommissioning overview tour to inform committee members of the issues that Sellafield Ltd face in decommissioning the site. The scope of this visit did not include the high hazard facilities on this occasion. We would strongly encourage that a separate tour of the high hazard decommissioning portfolio is arranged, preceded by a presentation, so that members of the committee can understand the issues and the imperative, to progress decommissioning in this area. However, the tour as arranged, still provided a good indication of the facilities being decommissioned and the methods, both remote and hands on, that are being utilised to realise the programme. We were impressed by the routine use of the Waste Management Hierarchy to minimise waste volumes, for example in the re-categorisation of wastes through processing and monitoring to enable their diversion away from costly radioactive disposal, where appropriate to do so.