

## **CUMBERLAND COUNCIL RESPONSE TO CONSULTATION ON DRAFT NDA BUSINESS PLAN 2024 - 2027**

1. Cumberland Council welcomes the opportunity to comment on the draft Nuclear Decommissioning Authority (NDA) Business Plan for 2024 - 2027. This response has been developed by officers in consultation with elected Members on the Council's Nuclear Issues Board.
2. With a significant proportion of the NDA's mission located in Cumberland, including many of its most challenging and hazardous facilities and materials, Cumberland Council engages with the NDA on all aspects of its work and welcomes the NDA's ongoing commitment to transparency and engagement with local communities.
3. The Business Plan is one of a number of documents the NDA publishes to explain what it is doing and how it goes about it. Providing clear information about its work to as wide an audience as possible is a key part of the NDA's engagement activity and the Council welcomes introduction of the NDA's new Mission Progress Report as a helpful contribution to this aim.
4. We note page 14 of the Business Plan discusses prioritisation and allocation of funding and includes the statement that the NDA will focus on reducing its highest hazards and risks. Cumberland Council strongly supports this position. Achieving progress with remediating high hazard legacy facilities at Sellafield as quickly as possible must be the NDA's priority. Where Sellafield forms part of plans for decommissioning facilities at other NDA sites (such as consolidation of Dounreay Fast Reactor fuel at Sellafield), such plans should not have a negative impact on the speed of progress with recovering spent fuel and waste from those priority legacy facilities at Sellafield.
5. The draft NDA Business Plan contains helpful information about anticipated timescales for the completion of different programmes of work. From this we would make a number of points and observations. We note from page 21 of the document that all fuel from the AGR power station fleet is scheduled to be in interim storage by 2035 and that some enhancement of capacity is required at Sellafield to facilitate bulk

defueling of AGR power stations. Presumably this data will be amended if AGR fleet operator EDF intends now to extend the operating lifetime of the four operating AGR power stations. We look forward to receiving more information about how any revised plans for operating those stations may affect the extent to which the envisaged enhanced fuel management capacity at Sellafield is needed.

6. We note also from page 21 that all remaining Magnox fuel is scheduled to be in interim storage by 2042. We will continue to engage with the NDA and Sellafield Ltd about progress in delivering this outcome and about what risks might affect achievement of that target date.
7. We note from page 23 that all legacy Intermediate Level Waste (ILW) should be retrieved by 2060 and would again stress the need to prioritise recovery and treatment of waste from high hazard legacy facilities at Sellafield. There appears to be a typing error on the date attached to outcome 34. We assume this date should read 2134. We note also that all UK owned High level Waste (HLW) is expected to be in interim storage by 2039 and that repatriation of HLW to foreign owners will be completed by 2029 in accordance with contractual commitments. We will continue to engage with the NDA about progress with the waste return programme and about any operational obstacles to achieving these target dates.
8. Page 24 indicates all new NDA buildings will be operational by 2090. As the Local Planning Authority, Cumberland Council will continue to engage constructively with Sellafield Ltd about proposed new buildings expected to be constructed at the Sellafield site.
9. As a member of the Nuclear Legacy Advisory Forum (NuLeaf), Cumberland Council will contribute to NuLeaf's separate response to this consultation. As a member of the West Cumbria Sites Stakeholder Group (WCSSG), we will also contribute to their separate response.

Ends