



Geological Disposal

RWMD Issues Process Briefing Note

April 2011

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RWMD Issues Process Briefing Note

This note has been produced in response to a request to brief the West Cumbria MRWS Partnership Meeting on the 14 April 2011. This briefing note will provide the basis for the discussion on the Radioactive Waste Management Directorate's (RWMD's)¹ process for managing issues that need to be addressed to achieve the successful implementation of geological disposal for higher activity radioactive wastes.

The West Cumbria MRWS Partnership has expressed specific interest in how RWMD is responding to Nuclear Waste Advisory Associates (NWAA) issues register. This briefing note describes at a high-level the process that RWMD plan to operate for managing issues² from a range of sources internal and external to RWMD, including those raised by NWAA.

This note provides an overview of:

1. RWMD's process for managing concept issues;
2. The identification of potential concept issues;
3. The assessment and screening of potential concept issues;
4. The evaluation of concept issues;
5. Management of concept issues;
6. Regulatory and stakeholder interactions.

¹ RWMD is the Directorate of the Nuclear Decommissioning Authority (NDA) responsible for delivering geological disposal on behalf of Government.

² This briefing note it is not intended to explain all the detailed aspects of the RWMD procedure for managing concept issues.

1 Overview of RWMD's process for managing concept issues

Potential 'concept' issues, (e.g. scientific, technical, environmental, economic, social or ethical issues which could affect the concepts being developed for the disposal system) are regularly identified from a range of sources including those internal and external to RWMD.

RWMD has recently developed and published a geological disposal implementation programme³. In order to ensure that potential concept issues raised internally or externally regarding the work of RWMD are properly considered and where appropriate incorporated into the work programme a process⁴ for managing concept issues has been developed. The key objectives for this issues management process are to provide RWMD with:

- A clear view of what concept issues RWMD needs to address;
- A basis for responding to potential concept issues and queries raised both internally and externally.

The issues management process includes an initial screening step so that the concept issues register records the actual issues that RWMD believes:

- Threaten confidence in the implementation of geological disposal in the UK; or
- Present opportunities for significantly improving the implementation of geological disposal in the UK.

In summary, all potential issues that relate to development and implementation of a geological disposal facility are captured on a potential concept issues list. These are assessed by RWMD and those deemed to meet either of the criteria above are transferred to a concept issue register. The concept issue is then evaluated in more detail and a work programme developed and implemented to address the issue. This process is briefly described in the following sections of this note and is summarised in the flow chart in Figure 1.

The process is being developed prior to implementation. We are currently at the stage of populating a potential concept issues list and assessing these issues. Therefore, a potential concept issues list and concept issues register have not yet been published.

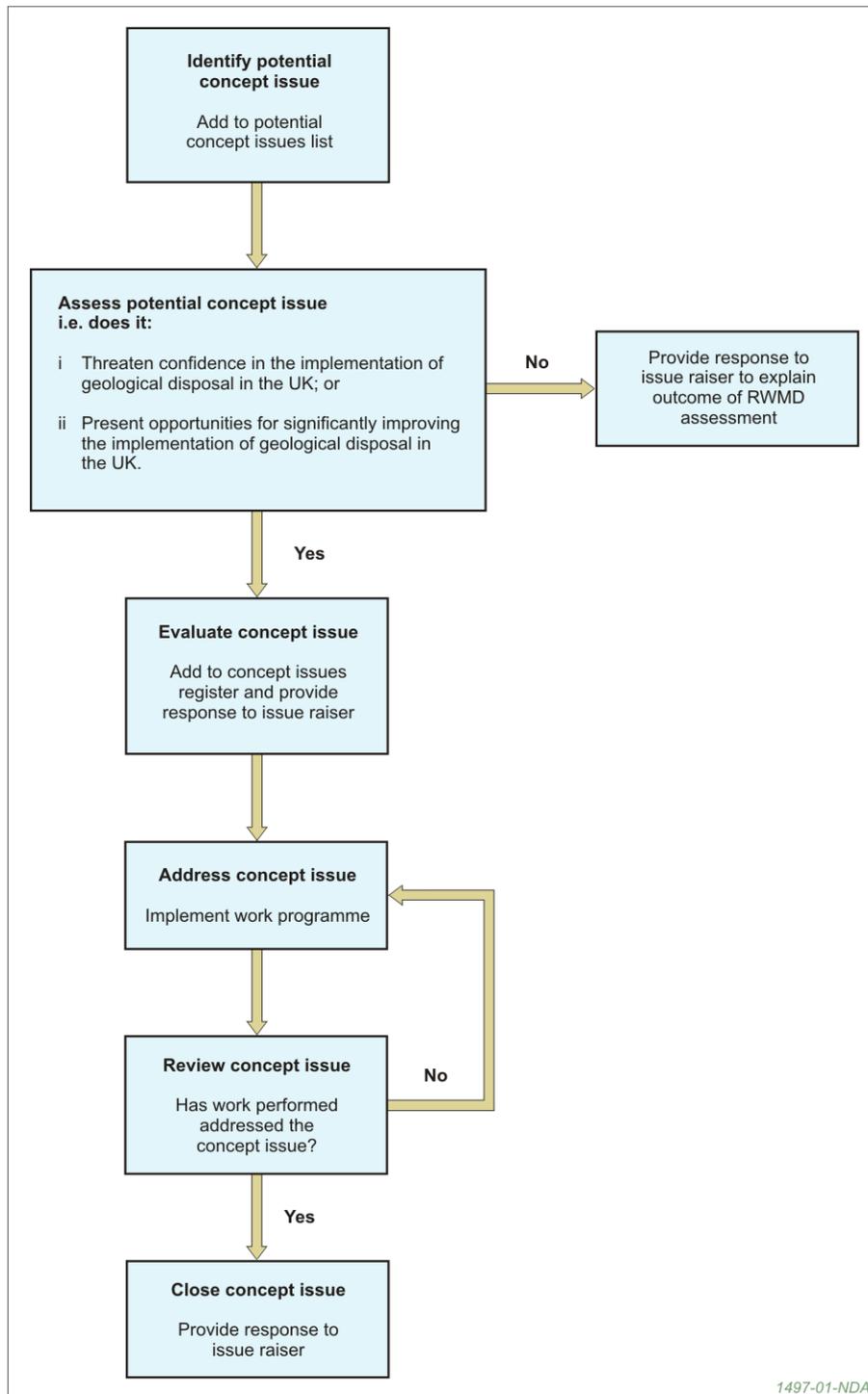
The potential issues raised by the NWAA will be assessed and screened by RWMD over the next few months. In the meantime, we have developed a response⁵ to each of the issues raised, supported by our recently published generic Disposal System Safety Case.

³ NDA, *Steps towards implementation*, NDA Report no NDA/RWMD/013, 2010.

⁴ The process described in this paper specifically relates to concept issues. It does not include programme or project issues (i.e. issues that relate to the management of the work programme such as delays to the completion of projects, lack of resources or additional project costs) or risks that are managed through RWMD programme and project control procedures.

⁵ NDA, *Geological Disposal: Response to Nuclear Waste Advisory Associates Issues Register*, NDA Report, 2011.

Figure 1 Overview of RWMD Issues Management Process



2 Identification of potential concept issues

Potential concept issues will be identified and raised with RWMD from a wide range of sources including;

- RWMD - e.g. those identified through iterative development of the disposal system, packaging assessments, upstream optioneering, self challenge, peer review;
- Regulators - as part of the Regulators' joint issues resolution process (IRP)⁶;
- CoRWM - through scrutiny of the Government's and NDA's proposals, plans and programmes to deliver geological disposal;
- Community Siting Partnerships – including issues raised during partnership meetings;
- Waste producers and potential new build operators;
- Other stakeholders – this includes issues raised by NGOs and other organisations (e.g. NWAA⁷) or questions or queries⁸.

All potential concept issues will be fed into the process and captured on a potential concept issues list.

3 Assessment and screening of potential concept issues

A key stage of the process is to assess the actual issue and group similar, or related, potential concept issues together. The potential concept issues are then assessed and screened to determine whether RWMD believes the potential concept issue:

- Threatens confidence in the implementation of geological disposal in the UK; or
- Presents an opportunity for significantly improving the implementation of geological disposal in the UK.

If, through the screening process it is decided that a potential concept issue:

- Does not meet either of these criteria then the decision will be recorded on the potential concept issues list and a response will be sent to the person or organisation who raised the potential issue. This response will explain why the matter is not considered to be a concept issue by RWMD and outline any further action taken.
- Does meet either of these criteria it will be transferred to the RWMD concept issues register and a work programme will be developed to address it (as outlined in section 4) and 5)).

⁶ <http://www.environment-agency.gov.uk/business/sectors/111766.aspx>

⁷ Nuclear Waste Advisory Associates (NWAA) is an independent group of experts providing information and advice on the risks posed by radioactive waste and support to decision makers, stakeholders and communities involved in its management, see <http://www.nuclearwasteadvisory.co.uk/> for more details.

⁸ Requests for readily available information (i.e. published reports) will not be captured on the potential concept issues list as these are dealt with under our request for information policy.

It will not be possible or necessary to address some concept issues at the current stage of the MRWS site selection process but the concept issue will be captured on the register and a timescale for review defined. The concept issue will then be addressed at the appropriate point in the implementation programme.

Some issues raised may already be captured on the concept issues register and therefore be being addressed as part of our ongoing work programme. If this is the case we will:

- Update the concept issues register to note who has recently raised the issue; and
- Review the concept issue to determine whether its priority, timing or categorisation and hence work programme should be updated.

4 Evaluation of concept issues

New entries on the concept issues register will be evaluated to determine the work required to address the concept issue.

The evaluation process includes the following considerations:

- **Priority⁹ and timescale:** for addressing the issue will be determined; some issues may only become relevant at a site-specific stage of the programme and, thus, will be reviewed at an appropriate point in the future. In other cases work will begin immediately to address the issue.
- **Categorisation:** in terms of the significance of the issue for the nuclear safety and environmental performance of a geological disposal facility. This will determine the level of review and approval needed for the work programme.
- **Work programme:** the work programme required to address the issue, including progress points to review progress and revise work scope if required.
- **Potential for changes to the technical baseline:** whether an issue will potentially require a change to the technical baseline (i.e. the disposal concept documentation that underpins the generic disposal system safety case and disposability assessment process). If a change to technical baseline is required then the change control procedure will be initiated.
- **Potential for Programme/Project Change:** whether a change to the programme or project is required (in terms of scope, schedule, risk, cost or procurement plans) in order to address the issue.

⁹ RWMD's approach to prioritising Research and Development needs is described in the recently published NDA, *Geological Disposal: R&D programme overview Research and Development needs in the preparatory studies phase*, NDA Report No. NDA/RWMD/073, February 2011.

5 Management of potential concept issues and concept issues

A work programme to address the concept issue will then be implemented, if this is not already in place. A response will also be sent to the person or organisation that raised the issue to explain how we are dealing with the concept issue.

The work programme to address the concept issue will be monitored and reviewed upon completion. If the concept issue has been addressed the issue will be closed and record of this made on the concept issues register. If not a revised work programme will developed and implemented.

RWMD will maintain an up-to-date potential concept issues list and concept issues register. These will be published on the website at regular intervals. Relevant fields for publication are envisaged to include:

- the originator of the potential concept issue (association/affiliation) if they are happy with this;
- date raised;
- description of the potential concept issue;
- summary of the outcome of the assessment of the potential concept issue (i.e. is it considered by RWMD as a concept issue or not and the reason(s));
- summary of the work planned to address the concept issue;
- response to the originator of the potential concept issue.

It is therefore intended that RWMD will make the issues management process visible to stakeholders and regulators.

6 Government and Regulator interfaces

The Department of Energy and Climate Change (DECC) is keen to monitor key issues which may influence the implementation of geological disposal and the development of policy in this area and is considering how issues should be made visible to the Geological Disposal Implementation Board which is chaired by a Government minister.

With effect from 4 January 2011, The Health and Safety Executive (HSE), the Environment Agency (EA), and the Department for transport (DfT) are operating a joint issues resolution process (IRP) to support their scrutiny of RWMD's submissions supporting implementation of geological disposal¹⁰. The IRP is intended to capture issues that the Regulators consider may impact on future regulatory decisions, that cannot otherwise be addressed quickly and simply by discussing them directly with RWMD. For each issue the regulatory basis will be set out, and specific actions defined for RWMD to carry out.

The Regulators will maintain a database to log and monitor issues and their associated actions. This database is likely to be publicly available on the internet. In order to be comprehensive the RWMD issues management process (including potential concept issues list and concept issues register) would continue to include issues raised through the IRP.

¹⁰ See http://www.environment-agency.gov.uk/static/documents/Business/Joint_EA_HSE_DfT_IRP_Summary_i1.2_31012_011.pdf

7 Next steps

We are currently at the stage of populating a potential concept issues list and assessing these entries as described above. It is envisaged that a potential concept issues list and concept issues register will be published later in 2011.

The potential concept issues raised by the NWAA will therefore be assessed and screened by RWMD over the next few months. In the meantime, we have developed a response to each of the issues raised, supported by our recently published generic Disposal System Safety Case.



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