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Title:	NDA Response to Regulatory Review of gDSSC, a Briefing to the West Cumbria MRWS Partnership
Author:	NDA RWMD
Notes:	Can be read in conjunction with Regulators' Review, Doc 253

1. In February 2011 NDA Radioactive Waste Management Directorate launched the generic Disposal System Safety Case. The DSSC presents for the first time an integrated safety assessment for the disposal of all higher activity wastes and materials defined in the MRWS baseline inventory. The DSSC is a significant suite of documents setting out the current status of the science underpinning geological disposal. At this stage it is generic; decisions on disposal concepts and sites have not yet been made and the DSSC therefore includes designs and assessments based on illustrative concept examples for 3 different geological settings.

The generic DSSC suite was produced not to meet a regulatory requirement but to give stakeholders early access to our developing safety case and underpinning scientific basis. Following publication we have engaged with CoRWM and with regulators to seek feedback on the approach set out in the documentation. In December 2011 the Environment Agency (EA) and the Office for Nuclear Regulation (ONR, now including the Radioactive Materials Transport Team) completed a joint review of RWMD's generic Disposal System Safety Case (DSSC)<sup>1</sup>. We are aware that CoRWM is also preparing a formal response setting out the conclusions of its review.

## 2. Main findings of the regulatory review

Regulators stated that:

*"We consider that the broad structure of the gDSSC is acceptable in terms of the general coverage of the documents and of the links shown between them, and that the documentation is of generally high quality. The gDSSC provides confidence, to a degree appropriate at this early stage in implementing geological disposal, that a safety case for a GDF in the UK could be made, providing a suitable site is available ... We have identified no specific issues that would prevent such a safety case, capable of meeting transport, operational and environmental regulatory requirements, being made for a GDF in the future, providing a suitable site is available and RWMD continues to work with us to address our issues and concerns."*

Regulators also complimented RWMD on its *"active and visible approach to dialogue with communities and others such as pressure groups and academics"*.

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<sup>1</sup> Joint regulatory scrutiny of RWMD's work relating to geological disposal of higher activity radioactive waste: Regulatory review of the generic disposal system safety case, Report: GENW1211BVDX-E-E, Issue 1, Office for Nuclear Regulation and Environment Agency, December 2011

### 3. Regulatory recommendations

The regulators made five headline recommendations with a number of detailed recommendations and other points for consideration:

- R1. RWMD should explain the future role of the gDSSC and develop a clear route map to show how it might develop the gDSSC towards a site-specific Disposal System Safety Case (DSSC).
- R2. There is much repetition and overlap between documents in the gDSSC. RWMD should aim to strike a better balance that will address the needs of different audiences, and help to produce a stable and enduring suite of safety case documents.
- R3. RWMD should continue to work towards making the gDSSC reasonably accessible to a wide audience.
- R4. RWMD should clarify how it will apply change control to the suite of documents and the statements it contains.
- R5. RWMD should include a wider exploration of waste inventory uncertainty in future revisions of the gDSSC.

### 4. RWMD response

Shortly after publication of the regulatory review RWMD responded publicly with a statement on the NDA's website from RWMD's Managing Director welcoming the review and regulators' helpful recommendations<sup>2</sup>.

RWMD has committed to preparing a response to each of the recommendations to give visibility to regulators and stakeholders of RWMD's position on each and the proposed way forward. These responses remain 'work in progress' as of mid-February 2012 but in general we envisage our responses will follow one of four routes:

- The recommendation is noted and will be addressed when the specific document is next updated.
- The recommendation is fed into our technical work programme and work to take forward our understanding of the particular point will be commissioned.
- No additional action is necessary. The particular point is something we are aware of and is already included within our technical programme.
- The recommendation leads to dialogue with regulators. We may disagree with the point being made or may determine that discussion is required to fully understand the issue and to identify the appropriate way forward.

RWMD is aiming to provide its detailed response to regulators by end-April 2012.

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<sup>2</sup> <http://www.nda.gov.uk/news/regulatory-review-gdssc.cfm>