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Office for Nuclear Regulation
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TRIM Ref No: 2014/103033Your Ref: RS/NUC/Torness
RS/NUC/Hunterston
Unique No:12th March 2014

Dear Ms Watson,

APPLICATIONS TO DISPOSE OF RADIOACTIVE WASTE FROM TORNESS AND HUNTERSTON POWER STATIONS

Thank you for your letter consulting HSE-ONR on applications received from EDF Nuclear Generation Ltd under section 17 of the Radioactive Substances Act 1993 (RSA93) to vary the limitations and conditions of the Authorisations held for Torness and Hunterston B power stations.

I understand that the aim of the requested variation is to increase the number of disposal routes for radioactive waste to off-site facilities. Your letter summarised the requested variation in four parts, I have provided a response on behalf of HSE-ONR against each part. I have used your numbering scheme, with your original text in **bold** and my response in *italics*.

1. To allow the disposal of low level radioactive wastes to facilities which are not specified in the Station Authorisation and which have appropriate permits to accept the waste. These facilities may not be based in the UK. Currently, the Authorisation only allows for specific wastes to be sent to named facilities. This request is in line with current SEPA policy on the regulation of disposal of radioactive low level waste from nuclear sites.

ONR has no objection to this request, the requested variation should facilitate timely disposal of radioactive waste from the sites which will improve compliance with Licence Condition 32 'Accumulation of Radioactive Waste'.

2. To allow the disposal of higher active radioactive wastes to a number of named facilities as well as facilities that might be developed in the future. These facilities may not be based in the UK. It is currently SEPA policy to specify the waste type and route for higher active wastes.

ONR has no objection to this request provided that the transfers are compliant with the appropriate Transport Regulations and the Licensee can demonstrate that the treatment will result in a waste product that is disposable to suitably authorised sites. The requested variation provides flexibility to make use of treatment routes in the UK and overseas that may be able to produce a disposable waste product from Intermediate Level Waste accumulated on the sites that presently has no disposal route.

3. To remove the authorised limits relating to radionuclide and activity as well as the specification of physical and chemical characteristics for radioactive wastes being disposed of by transfer to

Mark Foy: Deputy Chief Inspector and Director Civil Nuclear Reactors Programme

another facility. This request is in line with current SEPA policy on the regulation of disposal of radioactive low level waste from nuclear sites.

ONR has no objection to this request the requested variation should facilitate timely disposal of radioactive waste from the sites which will improve compliance with Licence Condition 32 'Accumulation of Radioactive Waste'.

4. To allow the receipt of radioactive waste at both stations for interim storage and onward disposal. These wastes will have arisen at other EDF Energy stations and the intention is to allow for the accumulation of economic loads.

ONR has no objection to this request provided there are no significant adverse operational impacts for the receiving site. An acceptable safety justification would need to be in place covering all relevant aspects and ONR would need to be satisfied concerning the safety, security, safeguards and transport implications (where relevant) of any transfer. There may be significant levels of stakeholder interest in inter-site transfers of radioactive waste which would have to be managed by the Licensee as appropriate.

I understand SEPA may undertake a wider consultation with relevant public bodies and the general public in accordance with its procedure for determining an application for substantial variation. I have no objection to this response being included in the wider consultation that will be undertaken by SEPA.

If you require any clarification on the contents of this letter, please contact me in the first instance.

I am copying this letter to ONR's Nominated Site Inspectors for Torness and Hunterston B; and to SEPA's Site Inspector for Hunterston B.

Yours sincerely,



Pia Sanyal
HM Principal Inspector