

Our Ref: RS/NUC/HUNTB

Station Director
EDF Energy NG Ltd.
Hunterston B Power Station
West Kilbride
Ayrshire
KA23 9QJ

If telephoning ask for:
Keith Hammond

28 January 2015

FAO Mr. Colin Weir

Dear Sir

**RADIOACTIVE SUBSTANCES ACT 1993
APPLICATION FOR VARIATION TO CERTIFICATE OF AUTHORISATION
REQUEST FOR FURTHER INFORMATION
RSA/A/0070022: HUNTERSTON B POWER STATION**

During 2014 SEPA consulted statutory bodies, the public and other relevant organisations on the application you submitted in December 2013 for variation to the Radioactive Substances Act 1993 (RSA93) Authorisation held for Hunterston B, certificate number RSA/A/0070022, and SEPA is now determining the application in light of these comments. In order to progress SEPA's determination process, it is necessary to request further information with regards several aspects of the application.

One of the application requests was for the ability to dispose of unspecified higher activity wastes to a number of named facilities as well as facilities that might be developed in the future, which may or may not be based in the UK. This request represents a change to current SEPA practice which is more restrictive and which specifies both the particular higher activity waste and its disposal destination in the RSA93 Authorisation. To progress SEPA's determination, the following further information is required:

1. Identify exactly which higher activity wastes are intended for disposal to which of the radioactive waste management facilities listed in the application.
2. Provide details regarding the arrangements that are, or would be, in place to demonstrate that the selected waste management option for the higher activity wastes identified in 1 above would represent Best Practicable Means (BPM).
3. Provide details of how the selected waste management options for the higher activity wastes, identified in 1 above, meet the aims and principles of Scotland's Higher Activity Waste Policy, 2011.

Provide an indication of the physical quantities, radionuclide content, activity per radionuclide and the anticipated frequencies of transfer of consignments for each identified higher activity waste being disposed of to each destination.

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Chairman
David Sigsworth

Chief Executive
James Curran

Angus Smith Building

6 Parklands Avenue, Eurocentral,
Holytown, North Lanarkshire ML1 4WQ
tel 01698 839000 fax 01698 738155
www.sepa.org.uk

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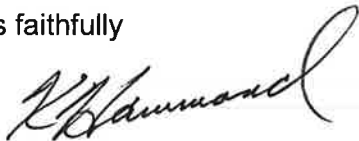
The responses to the above points should focus on the higher activity wastes for which you already have well defined waste management options. It is not SEPA practice, nor is it appropriate, to consider granting RSA93 authorisations that accommodate all unforeseen eventualities that may occur at some time in the future for higher activity waste.

A further aspect of the application that SEPA noted and that generated significant interest during consultation was the proposed transfer of radioactive waste to Hunterston B from other EDF stations before being transferred to another EDF station or for final disposal. A number of the comments received related to transport issues which are not a matter for SEPA when determining the application; however, other comments highlighted the lack of information with regards the proposed transfers. In this regard, SEPA requires the following further information:

1. More detailed description of the radioactive waste types that may be transferred to Hunterston B from other EDF stations. This description should include details of the physical quantity, radionuclide content, activity per radionuclide, physical characteristics of the waste and the anticipated frequency of this type of consignment coming to Hunterston B.
2. Whilst SEPA does not directly regulate the storage of radioactive waste on a nuclear licensed site, SEPA does have remit on the potential contamination of groundwater under the Water Environment (Controlled Activities) Regulations 2011 and a duty to ensure that any storage does not adversely impact on the disposability of the waste thereafter. Therefore, SEPA requests further details regarding storage arrangements for the radioactive wastes transferred from each EDF station.
3. The application stated that there would be no long term storage of radioactive waste transferred to Hunterston B; however, it did not define what the anticipated storage times would be. Therefore, SEPA requests details on what the onward disposal arrangements are for each of the radioactive waste types identified in 5 above and the anticipated times between the arrival of the radioactive waste on site to its departure from the site.
4. The application did not indicate what the decision making process would be for transferring radioactive wastes to Hunterston B, and in particular, how EDF would ensure that each transfer represented BPM. Therefore, SEPA requests more details of these arrangements.

Hopefully, this letter clearly outlines the further information SEPA requires at present to aid with the determination of your application. Should you wish any further clarification or discussion, please contact me directly.

Yours faithfully



Keith Hammond
Specialist 1- Radioactive Substances Policy and Nuclear Regulation

Cc: Mr Paul Meddings, Fleet Operational Radioactive Waste Management Group Head, EDF Energy, Barnett Way, Barnwood, Gloucester GL4 3RS