

Our Ref: RS/NUC/TORN
ESS

Your Ref: TOR13/046R

Mr Paul Winkle
Torness Power Station
Dunbar
East Lothian
EH42 1QS

If telephoning ask for:
Isabelle Watson

29 January 2015

Dear Paul

**Radioactive Substances Act 1993
EDF Energy NG Ltd- Torness Certificate of Authorisation – RSA/A/0070116
Application for Variation to the Certificate of Authorisation
Request for Further Information**

During 2014 SEPA consulted statutory bodies, the public and other relevant organisations on the application you submitted in November 2013 for variation to the Radioactive Substances Act 1993 (RSA93) Authorisation held for Torness, certificate number RSA/A/0070116 and is now determining the application in light of these comments. 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 active 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 RSA93 Authorisations. To progress SEPA's determination, the following further information is required:

1. Identify exactly which higher active 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 options 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, met the aims and principles of Scotland's Higher Activity Waste Policy, 2011.
4. 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.



Chairman
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The responses to the above points should focus on the higher active wastes for which you already have well defined waste management options. It is not current 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 active waste

A further aspect of the application that SEPA noted and that generated significant interest was the transfer of radioactive waste to Torness from other EDF stations before being transferred to another EDF station or for 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 would require the following further information.

5. More detailed description of the radioactive waste types that may be transferred to Torness from other EDF stations. This description should include details physical quantity, radionuclide content, activity per radionuclide, physical characteristics of the waste, and the anticipated frequency of this type of consignment coming to Torness.
6. Whilst SEPA does not directly regulate the storage of radioactive waste on a nuclear licensed site, SEPA does have remit on 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.
7. The application stated that there would be no long term storage of radioactive waste transferred to Torness; 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 4 above and the anticipated times between the arrival of the radioactive waste on site to its departure from the site.
8. The application did not indicate what the decision making process would be for transferring radioactive wastes to Torness, and in particular, how EDF would ensure that each transfer represented BPM. Therefore, SEPA requests more details of these arrangements are supplied.

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 sincerely



Isabelle Watson
RS Specialist

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