



Office for Nuclear Regulation

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RS/NUC/HUNTB

Date: 29 February 2016

Dear Isabelle

**RADIOACTIVE SUBSTANCES ACT 1993
APPLICATION TO VARY AUTHORISATIONS
2ND STAGE CONSULTATION
EDF ENERGY – HUNTERSTON B AND TORNESS POWER STATIONS**

Thank you for your letters regarding the second stage consultation with ONR on the 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.

Your letter summarises the main aspects of SEPA's determination of these applications, taking into account responses from the original consultation and includes a draft variation notice and attached schedules of conditions and limitations for each site. This letter provides a response on behalf of ONR on the changes being proposed.

In response to item 3 of your letter, regarding LLW transfers between the two power stations. I consider that the proposed variation should enable the two sites to optimise consignments of waste enabling prompt onward disposal. This is consistent with the licensee's obligation under Licence Condition 32 to carry out disposals in a timely manner and avoid long term storage on site when a disposal route exists.

Whilst recognising there will be significant stakeholder interest for transfers between the two sites, provided that an acceptable safety case can be made covering all relevant aspects, ONR has no regulatory basis for objecting to these transfers.

Overall, I consider that the proposed variation to the RSA93 Authorisations for Torness and Hunterston B provides increased flexibility to optimise waste disposals and should facilitate timely disposal of wastes. This is in line with ONR's regulatory expectations and as required by Licence Condition 32 'Accumulation of Radioactive Waste.' ONR therefore has no objections to the draft variation notice and attached schedules of conditions and limitations for Torness and Hunterston B power stations.

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

Yours sincerely

Louise Gray
ONR Inspector – Nuclear Safety

Distribution

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