

Our Ref: RS/NUC/TORN
ESS
Your Ref: TOR 16/002N

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

If telephoning ask for:
Isabelle Watson

11 February 2016

Dear Paul

**Radioactive Substances Act 1993
RSA/A/0070116 Application for Variation – Draft Schedules**

Thank you for your letter dated 8 of January regarding your comments to SEPA's proposed draft schedules to vary the Torness Power Station Certificate of Authorisation RSA/A/0070116.

With regards your comments on the specific wording within the draft schedules, SEPA has accepted these amendments.

SEPA has also considered your further point regarding the interpretation of the LLW/ILW boundary and provision of waste greater than 12GBq/tonne beta/gamma under the proposed variation. SEPA does not consider that the proposed variation or the existing Authorisation, as it stands, allows for the disposal of a LLW consignment which contains one or more discreet waste items with specific activities exceeding the current definition for LLW. Allowances for the inclusion of waste items known to be in excess of the LLW levels within LLW consignments is not current SEPA practice and may not accord with Scotland's Higher Activity Waste Policy. Moving to such a position represents a significant change and would require SEPA to enter into further discussion and consultation with a variety of stakeholders to ensure that this was an appropriate position to adopt. Whilst this could be done it would result in a lengthy delay to the current variation process.

Your letter also suggested that if the above position was not considered appropriate that a named route for solid drummed waste should be added to those in table 7.1. The routes currently named in table 7.1 are those which already exist in your current Authorisation or those which you were able to provide supporting information for, including a demonstration that the specified route was BPM. Whilst some assessment of the likely routes for drummed waste may have been carried out by EDF Energy, SEPA is not aware that a comprehensive BPM assessment has been done. Consequently, SEPA considers that it is not appropriate to specify a route for drummed solid waste with activity in excess of the current LLW limits at this time. Should further information become available, it can be considered; however, please note that this would delay the current variation process.

SEPA understands that you are keen for SEPA to complete its determination of your requested variation without further delay. Consequently, SEPA will continue its determination without the inclusion of further ILW disposal routes. If you wish to alter this approach, please inform me in writing no later than **29 February 2016**.

I have enclosed the latest draft schedules which form the basis for SEPA's final stage of consultation with ONR and FSS, and finally, providing there are no adverse comments from either statutory consultee, with Scottish Government

Yours sincerely

Isabelle Watson
RS Specialist

ENC: Amended Draft Schedules

