

Nuclear Information Service

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NIS UPDATE

17th December 2008

AWE Planning Application submitted for Assembly/ Disassembly facility

*The application is rather large and is being put on the West Berks. Council Planning website today. In the meantime the reference number is **08/02287/COMIND** and the description is "Construction of main process facility (MPF) and support building with 16 lighting protector towers, associated plant building, gate houses, vehicles inspection bays, sub-station buildings, security fence, access roads, hardstanding and sustainable drainage system (SuDS) infrastructure."*

This MOD Application is for AWE's proposed replacement Warhead Assembly/ Disassembly replacement facility, code-named MENSA after a star constellation. It is for the 'Gravel Gerties (GGs)' in the Burghfield high security area, where warhead nuclear packages are combined with high explosives, arguably the most sensitive operation at AWE, requiring utmost safety protection for the workers, the local community and the whole country. The PA Officers and Committee face a real problem with this application to build on a flood plain that actually suffered severe flooding in July 2007. The MoD, through AWE spokesmen, will state the imperative for approval of the application on 'national security' grounds. Both the HSE Nuclear Regulators (NRs) and the Environment Agency will be formally consulted, but in reality, these agencies have been working with AWE to prepare an application that they can approve by including remedial flood barriers in the plans.

New, safe facilities are desperately needed for the disassembly of the 100+ warheads in the current stockpile. Currently, NRs continue to permit work in the GGs only on a single-operation-approval basis owing to the poor condition of the buildings. However, in addition to disassembly, new facilities will provide warhead assembly workshops to last another 50 years.

NIS will be examining the new plans closely; they may not meet the required legal safety standard given the rapid escalation of Climate Change time-scales that are expected to increase unpredictable flood events. (See below: Emergency Planning for Serious Floods). AWE Burghfield may be all-together the wrong site for a nuclear warhead facility.

Flood Plain Application History

In August 2006, The Prudential Insurance Co. Ltd applied for planning consent to build much-needed 7,500 homes at Kennet Valley Park in the Burghfield flood plain. The plan tried to address the flood problem by 'the creation of a development platform through infilling'. Around a 1,000 objections were received from local residents concerned that their property might suffer flooding if the new development encroached on the flood plain. Other statutory consultees also objected, and the application was withdrawn in November 2006.

Grounds for Objection

- i. The *visual impact* of the proposed building is unacceptable;
- ii. *Traffic impact* in the building phase will cause delays and inconvenience on the Burghfield Road and put people at risk of road accidents;
- iii. A significant radiation risk should be *legally justified*;
- iv. The development should be subject to an *independent Environmental Impact Assessment* rather than a MoD equivalent;
- v. *No application should be approved on a flood plain* where buildings have suffered flooding over many years, most recently in July 2007 when 2-3 feet of water filled the warhead assembly plant, requiring the electricity supply, including alarm and safety mechanisms, to be shut off for 10 days;
- vi. The Applicant should be asked to withdraw the application and seek *an alternative site for a warhead disassembly plant*;
- vii. A facility to assemble new nuclear weapons is *contrary to the NPT*;
- viii. Any AWE development for the assembly of new warheads is of national interest and should be subject to a *Public Inquiry*.

Consultation Time-Scale

The Consultation period of 21 days cannot formally be extended as this is set out in the Council's procedures. However, given the Christmas holiday period and the fact that it is a major application, the Planning Officer will accept consultation responses and representations after the consultation deadline had officially expired. Objections should be sent to the Principal Planning Officer, Clive Inwards at the address below.

In the meanwhile, NIS will be approaching both the PA and the MoD to suggest that if a committee hearing is convened, the MoD Applicant should attend in addition to AWE representatives.

Applicant: MoD Estates Blandford House Aldershot GU11 2HA Tel: 01252 361922
Planning Authority Case Officer: Clive Inwards WBC Market Street Newbury RG14 5DL
cinwards@westberks.gov.uk Tel: 01635-5191111

Emergency Planning for Serious Floods

The threat of sudden and overwhelming floods was the risk under discussion at a recent Civil Contingencies Local Emergency Planning conference in London. The Conference was organised by the Public Policy Exchange, in association with the Centre for Parliamentary Studies and was attended by 25 delegates from the Maritime & Coastguard Agency, Army, Navy, local EPOs, Fire Services, the Scottish Executive, academics, a journalist and NIS (also representing NAG, Plymouth Peace Group and SCANS).

Phil Evans, the Meteorology Office Chief Advisor to the government, explained that weather forecasting is currently not good enough, giving only 1-12 hours warning of unpredicted events. Next year an improvement is expected, giving two days notice when new modelling programmes are installed in the Met. Super-computer. Climate change is

the challenge – and we don't know what we will be facing in future. The significant implication for AWE Aldermaston and Burghfield is that risk assessments may have to be re-drawn and could conclude that the risk will become too high to justify. Apart from flood risk, a lightning strike on nuclear materials or a weapon may become a more frequent possibility.

Extracts from the Pitt Review of the July 2007 floods were provided as background information. For example:

“...we firmly believe that the public interest is best served by closer cooperation and a presumption that information will be shared, We must be open, honest and direct about risk, including with the public. We must move from a culture of 'need to know' to one of 'need to share'.

Pitt Review 06/08 ES7

NII Quarterly Report 1 July -30th September 2008

<http://www.hse.gov.uk/nuclear/ilc/2008/aldermaston3.htm>

1. Change in ownership of AWE

After months of negotiations, there is still no confirmation that the contract between the MoD and Jacobs Ltd has been finalised for the take over of BNFL's share of AWEML. The announcement will be made by MoD, rather than AWEML and the new contractor will have responsibility for ensuring that AWEplc meets its nuclear license obligations. The Nuclear Regulator has already checked that the license holder, AWEplc, has addressed the possible nuclear safety implications of the change.

2. Regulators advise to Local Councils on Planning

The HSE/Nuclear Inspectorate is a non-statutory consultee, providing advice to Local Authorities with regard to planning applications in the vicinity of the Aldermaston and Burghfield sites. In August HSE/NII wrote to Basingstoke and Deane Borough Council advising against a proposed housing development on the Boundary Hall because of its size and close proximity to the AWE site in relation to the AWE off-site plan.

3. Freedom of Information

Two FoI requests for information were made to NII during the summer quarter in relation to AWE. While the regulator's report says it supports making appropriate information available to the public it then warns that time spent providing it has to be taken out of planned front line inspections at the AWE sites. This contradiction is worrying because the FoI system cannot work unless dedicated staff are employed to provide information in cooperation with the inspectors.

4. Improvement Notice on Criticality Control

AWE has until January 19th 2009 to complete the required improvements in the documentation system associated with criticality risk to avoid legal action by the regulators. By September, reported progress was mixed although overall, AWE was making satisfactory progress.

Change in Radioactive Waste Authorisation

On 1st December, the Environment Agency issued a variation notice of Authorisation under the Radioactive Substances Act 1993, for the disposal of radioactive waste from AWE plc, Aldermaston, Reading.

This variation allows for the transfer of uranium-contaminated oils, cutting fluids and aqueous acid washings from AWE Aldermaston to the Springfields Nuclear Site, Lancashire for treatment by acid washing. Previously there was no separate authorisation for Uranium waste to go to Springfields in addition to the 55 GBq limit for transfer to Drigg.

Description	Reference Number	Issued	Effective Date	Type of change made or comments
Authorisation	BZ1994	24/01/2007	01/03/2007	
Variation	CC7544	11/11/2008	01/12/2008	Addition of a waste transfer route to the Springfields Nuclear Site, Lancashire

Oils, Cutting Fluids and Aqueous Acid Washings

<i>Person to whom the waste may be transferred</i>	<i>Radionuclide</i>	<i>Annual Activity Limit (cubic metres)</i>	<i>Annual Volume Limit</i>
<i>Transfer, for the purpose of treatment, to the Springfields Nuclear Site</i>	<i>Uranium</i>	<i>15GBq</i>	<i>10</i>

NIS Legal Challenge of the replacement of Trident

A date has been set for the Nuclear Information Service Appeal, calling for governmental accountability of the illegality of the replacement and maintenance of the UK's nuclear weapon system proposed in the Government's White Paper, 'The Future of the United Kingdom's Nuclear Deterrent', published on 4 December 2006. NIS's application for Appeal against the decision not to allow a judicial review of the Trident decision is listed to be heard on Monday 26th January 2009 in the High Court, The Strand London at 10.30am.

NIS Updates

Previous issues of NIS Updates are available on the NIS website at <http://www.nuclearinfo.org/>